

IN THE CIRCUIT COURT FOR
BALTIMORE COUNTY MARYLAND

JOHN DOE 1
c/o Murphy Falcon & Murphy
One South Street, 30th Floor
Baltimore, Maryland 21202

and

JOHN DOE 2
c/o Murphy Falcon & Murphy
One South Street, 30th Floor
Baltimore, Maryland 21202

and

JOHN DOE 3
c/o Murphy Falcon & Murphy
One South Street, 30th Floor
Baltimore, Maryland 21202

and

JOHN DOE 4
c/o Murphy Falcon & Murphy
One South Street, 30th Floor
Baltimore, Maryland 21202

and

JOHN DOE 5
c/o Murphy Falcon & Murphy
One South Street, 30th Floor
Baltimore, Maryland 21202,

Plaintiffs,

v.

WORLD WRESTLING ENTERTAINMENT,
LLC,
707 Washington Boulevard,
Stamford, Connecticut 06901

Serve On :

Civil Action No. C-03-CV-24-004019

JURY TRIAL DEMANDED

Corporation Service Company
Goodwin Square, 225 Asylum Street
20th Floor
Hartford, Connecticut 06103

and

VINCENT K. MCMAHON
Address Unknown

and

LINDA MCMAHON
Address Unknown

and

TKO GROUP HOLDINGS, INC.,
200 Fifth Avenue
7th Floor
New York, New York 10010

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

“When you’re on that fast track, you just didn’t think about the other people who were being hurt.” - Vince McMahon

Sexual Abuse of Ring Boys: “*And it was just generally known, by everybody, that it was going on. . . . It was a mess. It was an absolute mess. . . . [The McMahons] clearly knew what was going on,* but really did nothing to stop it. . . .” - WWE Executive

“I wish I could tell you the real stories; holy shit!” - Vince McMahon

I. Introduction

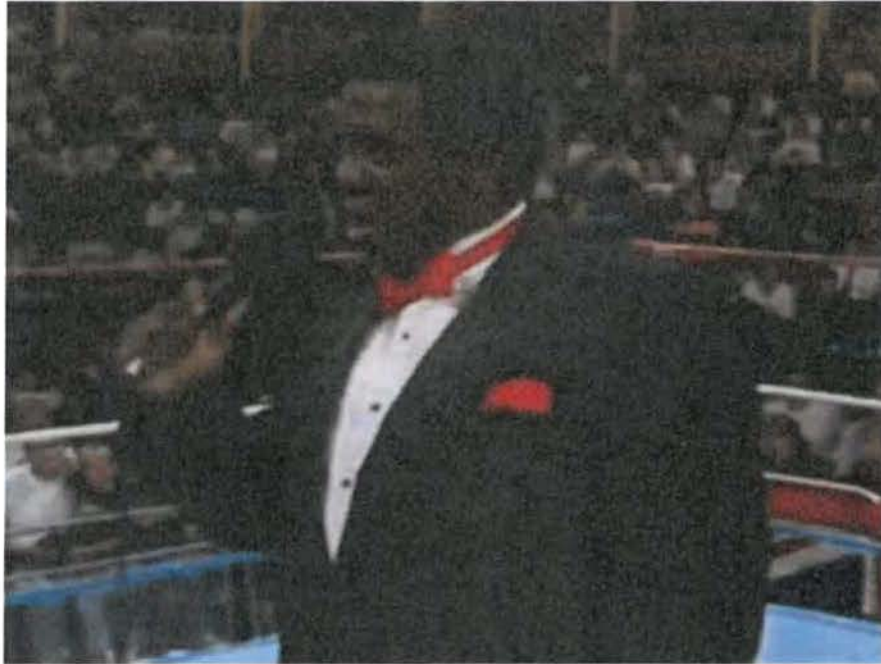
1. During the 1970s, 1980s, and early 1990s, Melvin Phillips Jr., a/k/a Mel Phillips (“Phillips”), worked for World Wrestling Entertainment, LLC (“WWE”)¹ as its prominent ringside announcer and ring crew chief. Using his public and highly visible positions in an industry thriving on young adults for fandom, Phillips hired underaged boys (often as young as 12 and 13 years old) to assist the ring crew with errands and other tasks in preparation for WWE’s wrestling shows. Phillips’s recruits were known within WWE as “Ring Boys.”

2. Phillips’s real motivation in luring the Ring Boys with the promise of gaining access to the popular WWE events was to sexually abuse them. And Vince McMahon knew it, admitting that he was aware, at least as early as the 1980s, that Phillips had a “peculiar and unnatural interest” in young boys. Mr. McMahon has never denied making that admission, despite countless instances over the last four decades where, if it were untrue, he would have stridently denied it. He didn’t because it is true.

3. Defendants knowingly gave Phillips free rein to use his highly public WWE personality and image to entice local kids from the area near the WWE shows to help set up and take down the wrestling ring. Phillips lured and manipulated the young boys with promises of meeting famous wrestlers and attending the highly popular wrestling shows, experiences that were otherwise unattainable for these kids. Like many pedophiles, Phillips targeted young boys from broken homes and even routinely traveled with them, in plain sight, staying together in hotel rooms and driving in his car to WWE events across the Northeast corridor.

¹ WWE was formerly known as a variety of names, including the World Wide Wrestling Federation (“WWWF”) and World Wrestling Federation (“WWF”). WWE is used synonymously with WWF and WWWF.

4. Defendants knowingly allowed Phillips to exploit his position at the WWE to groom and abuse Ring Boys, even in plain sight of wrestlers and executives in the locker room area.



5. At some venues, Defendants even provided Phillips with his own private dressing room where he would use his own expensive video camera (extremely rare at that time) to film his sexual escapades with the children.

6. This action is brought by survivors of sexual abuse committed by Phillips who groomed, exploited, and sexually abused underaged Ring Boys. While five of these survivors have initially come forward, there are undoubtedly countless others who still suffer in silence. This lawsuit is the tip of the iceberg; more revelations will certainly follow in the coming months.

7. New York Post reporter Phil Mushnick stated in the recently-released Netflix docuseries, "*Mr. McMahon*," that Phillips and other WWE executives in the McMahons' inner circle were part of a pedophile ring. After writing about the WWE years ago, Mushnick's mailbox became stuffed with messages that all essentially read the same: "You don't know the half of it –

you don't know how bad it is within the ring and within the locker rooms." Mushnick said he returned some phone calls "and it was mind-blowing."

8. Phillips's abuse came to the attention of the FBI who had received a videotape that was shot by a WWE employee and was in the possession of the WWE well before it was ever sent to the FBI, who documented at least ten Ring Boy victims:²

On 8/3/93, the U. S. Attorney's Office acquired the 1/2 inch video tape entitled the [redacted] in which is believed to show PHILLIP'S unusual foot fetish.

For information of BSU to date the NY investigation has identified ten victims of PHILLIPS. [redacted]

[redacted] PHILLIPS.

A review of the [redacted] tape by NYO shows PHILLIPS lying with [redacted] foot in crotch area for extended period of time. All victims have stated that PHILLIP plays with their feet for extended periods of time between 1/2 hour to 2 hours in duration. NY has subpoenaed PHILLIPS to Grand Jury but was told by prosecutors he will take the 5th Amendment. NY would like to indict PHILLIPS on Sexual Abuse charges if video is consistent with BSU Sexual Abuse Guidelines.

9. In addition to the federal government's explicit knowledge, it was common knowledge in the WWE—among the ring crew, wrestlers, and executives—that Phillips surrounded himself with a posse of underaged Ring Boys, including when he traveled to across state lines and stayed in hotel rooms with the children.

10. It was also well known throughout the WWE that Phillips had sexual fetishes for young boys; namely, and only partially, because Phillips didn't try to hide his recruiting and cavorting with underaged boys, including exhibiting his foot fetish for young boys in front of

² "FBI Case Document, Case No. 196B-NY-234993", <https://www.documentcloud.org/documents/20398610-wwf-fbi-file-ocr#document/p160> (last visited Oct. 21, 2024) (redactions in original).

WWE personnel. It was there for the WWE and its leaders to see in plain sight; yet no one did anything to stop Phillips's rampant and open abuse of young boys.

11. The widespread knowledge of the abuse was confirmed by a former high-level WWE executive:

The boys that the company hired to put up the ring and so forth, were being . . . *had* [that is, abused] by some of the folks who were in the wrestling [operations] side of things. *And it was just generally known, by everybody, that it was going on. . . . It was a mess. It was an absolute mess. . . . [The McMahons] clearly knew what was going on*, but really did nothing to stop it. . . . There was not a damn thing we could do about it.³

12. Below is a photo taken by Phillips of three Rings Boys near the ring at a WWE event, showing the allure of Phillips's position and, therefore, his ability to groom and entice vulnerable young fans of wrestling for his own sexual gratification:



³ *Business Insider*, “WWE cofounder Linda McMahon, who runs Trump’s biggest super PAC, once hired a suspected child molester on the condition that he ‘stop chasing after kids.’ He didn’t.”, <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024) (emphasis added).

13. Defendants Vincent K. McMahon (“Vince” or “Mr. McMahon”) and Linda McMahon (collectively the “McMahons”), knew, at least as early as the early to mid-1980s, that Phillips had, as Vince McMahon stated, a “peculiar and unnatural interest” in young boys. Defendants’ *admission* of knowledge pre-dated Phillips’s abuse of the Plaintiffs in this case.

14. In 1988, the McMahons fired Phillips after even more allegations were made about Phillips sexually abusing children. But inexplicably, six weeks later, the McMahons rehired Phillips, and he went back to recruiting young boys to sexually exploit them. The McMahons rehired Phillips on the condition that he “steer clear from kids.”⁴ He did not, and they knew it. But perhaps even more troubling, the McMahons concealed the reason for Phillips’s absence and his firing. By rehiring him, Defendants allowed Phillips to continue abusing innocent kids.

15. In 1992, New York Post reporter Phil Mushnick wrote a series of columns about the sexual abuse of the Ring Boys.

16. After the McMahons tried to silence Mushnick with a bogus defamation lawsuit, Mushnick testified under oath that Vince told him that he saw Phillips with these young kids all the time. Vince never denied that was true.

17. Mushnick’s article led to the empaneling of a grand jury.

⁴ *Cage Side Seats*, “Two New Accounts of Male Wrestlers ‘Ring Boys’ Being Sexually Abused at WWE in the 1980s”, <https://www.cagesideseats.com/wwe/2024/2/20/24078073/male-wrestlers-ring-boys-sexual-abuse-wwe-1980s-mel-phillips-terry-garvin-ring-boy-scandal-paul-roma#:~:text=Vince%20McMahon%20admitted%20at%20this.%E2%80%9Csteer%20clear%20from%20kids.%E2%80%9D> (last visited Oct. 21, 2024).

18. On July 15, 1992, the Miami Herald broke the story of the federal investigation into the WWE:

WWF under federal investigation (Miami Herald 7/15/1992)

WWF under federal investigation

By **ALEX MARVEZ**
Herald Writer

NEW YORK — The World Wrestling Federation is under investigation by the federal government on allegations of sexual abuse of minors and the illegal transportation of minors across state lines.

According to several sources close to the investigation, the U.S. Attorney's Office of the Eastern District of New York is focusing on two former WWF employees — Mel Phillips, a longtime ring announcer and

head of the promotion's ring-assembly crew, and Terry Garvin, a match-making assistant.

Mary Jo White, the chief U.S. Assistant Attorney of Eastern New York, would not confirm an investigation was being conducted. WWF spokesman Steve Planamenta was unavailable for comment.

SEARS
AUTO TINTING \$6995
All Cars
598-1841
10400 S.W. 72 St. OPEN 7 DAYS

The Miami Herald
Miami, Florida • Wed. Jul 15, 1992
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19. The FBI Behavioral Science Unit report noted that Phillips's sexual abuse was widespread, confirming, at that time, ten victims of Mel Phillips. The FBI also noted that Phillips's sexual abuse and foot fetish with underaged boys was consistent with other pedophiles:⁵

⁵ "FBI Case Document, Case No. 196B-NY-234993", <https://www.documentcloud.org/documents/20398610-wwf-fbi-file-ocr#document/p206> (last visited Oct. 21, 2024) (redactions in original).

Subject MEL PHILLIPS has a sexual preference for young adolescent boys which focuses around a strong foot fetish. His recruitment, seduction and manipulation of these boys is consistent with the behavior of hundreds of boy lover pedophiles studied by the BSSU. His focus on the feet and his apparent lack of more overt sexual acts is less common.

Although his activity with boys' feet is most likely sexual behavior, the material furnished does not provide conclusive evidence of this fact. In context, the video tape provided is of little evidentiary value because it was taken in a public setting and contains no obvious sexual activity. Too many alternative explanations could be offered by PHILLIPS for its content.

Most problematic is the fact that no alleged "victims" are willing to admit to or describe the sexual nature of their activity with PHILLIPS. [REDACTED]

[REDACTED]

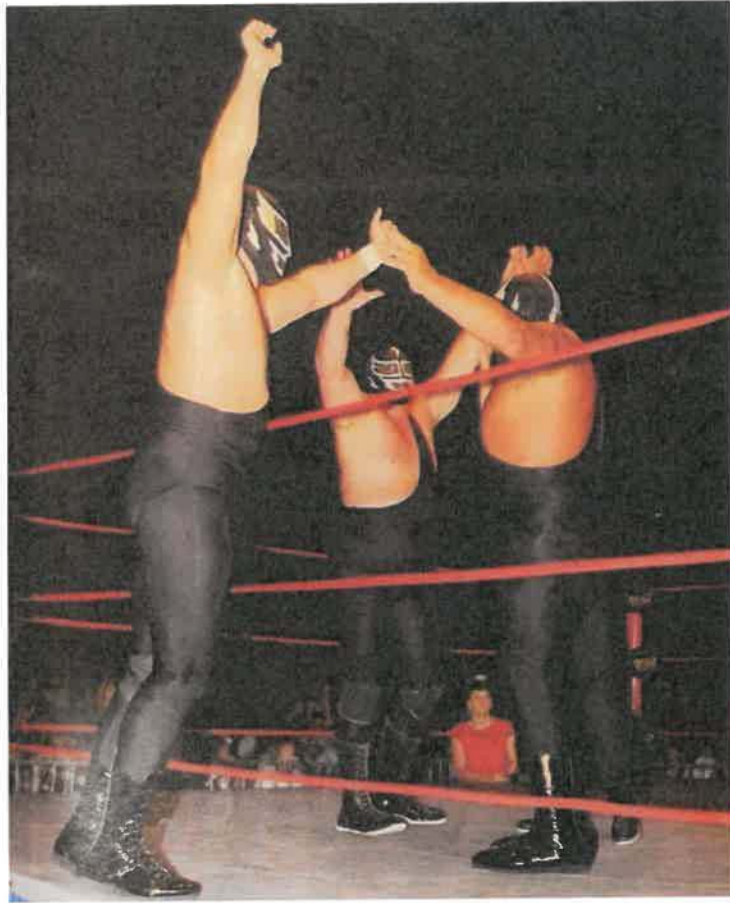
(redactions in original)

20. Defendants had specific knowledge regarding Phillips's deviant sexual behavior with children, including his sexual foot fetish.⁶ Linda McMahon even admitted in a 1993 television interview that Phillips had a foot fetish and that it had become a running joke in the WWE, but then claimed that it was being blown out of proportion.⁷

21. But the McMahons knew it was no joke, and that it was not being blown out of proportion, because at least one 16-year-old boy had already complained to them. Below is a photo of that young boy standing ringside, in front of the railing and even touching the ring.

⁶ A foot fetish is a pronounced sexual interest in feet, and it is the most common form of sexual fetishism for otherwise non-sexual objects or parts of the body.

⁷ *YouTube*, "Local Interview with Tom Cole Protest Outside WWF", <https://www.youtube.com/watch?v=zCq8t5rDhVQ> (last visited Oct. 21, 2024).



22. The WWE reached a financial settlement with the young boy (pictured above), but it set off a series of events between him and the WWE that eventually led to his death by suicide in 2021 when he could no longer deal with the damage done to him by the McMahons, the WWE, Phillips, and others. He implored his brother to tell his story, and his last known words were: “Remember to tell them [the WWE and the McMahons] what they did to me.”

23. Defendants allowed Phillips and others to engage in, and foster, the WWE’s rampant culture of sexual abuse. The perverse culture goes back to the organization’s early days, and has continued to recent times, as exemplified in the recently unearthed series of alleged sexual misconduct committed by Vince McMahon himself, the long-time kingpin and domineering influence over the WWE.

24. After decades of suffering in silence from their childhood trauma, these survivors come forward now to hold Defendants⁸ accountable for their conduct in allowing the systemic and pervasive abuse by Phillips.

25. Through investigation, the filing of *Grant v. WWE, et al.*, No. 24-cv-90 (D. Conn.), the acquisition of the WWE by TKO, and the ouster of Vince McMahon as CEO, Plaintiffs have learned the depth of knowledge that the McMahons and the WWE had about what happened to them and that sexual abuse in the company started at the top with the McMahons. This case will bring to light the truth about this systemic, insidious, and life-altering abuse.

⁸ Phillips is not named as a defendant in this case because he is dead. Plaintiffs bring this action because the WWE and its co-founders, Vince and Linda McMahon, among others: knew or should have known about Phillips’s abuse of the Ring Boys; had a duty to protect the underaged boys; and knew of his proclivities and his perpetual, personal posse of underaged boys, yet failed to prevent the abuse by taking even the most reasonable measures (such as not permitting Phillips to be associated with, in any capacity, the WWE which he used as a grooming ground to foster the sexual abuse in which he engaged).

II. Statement of Facts

A. Defendants Knew About Mel Phillips's Sexual Abuse of the Ring Boys.

26. The WWE and McMahons knew about Phillips's sexual abuse of Ring Boys but did not take any measures to prevent it, or to protect the young boys. Instead, for years, they knowingly allowed Phillips to use the allure and stature of being associated with the WWE to lure, recruit, groom, and sexually abuse numerous underaged boys.

27. Phillips's sexual assaults occurred not only at the wrestling venues, but also in hotel rooms and other places where Phillips would shuttle the boys in plain sight.

28. Phillips would get completely naked and require the young boys to be naked for extended periods of time, including throughout the night when they would be coerced to share a bed with Phillips. Phillips would sometimes videotape the assaults.

29. After the Ring Boy Scandal became public in 1992, the WWE was under investigation by the federal government on allegations of sexual abuse of minors and the illegal transportation of minors across state lines, with investigators focusing on Phillips, Pat Patterson, and Terry Garvin. The latter two were high-level WWE executives and trusted lieutenants of the McMahons.

30. Despite the FBI's acquisition of videotape evidence (referenced above) of Phillips's actions and its conclusions regarding Phillips's inappropriate sexual proclivities for young boys, charges were not brought primarily because "no alleged 'victims' [we]re willing to admit to or describe the sexual nature of their activity with Phillips."

31. Fear, shame, and the McMahons' strong-arm tactics and legal machinery were overwhelming, keeping even the strongest Ring Boys silent for decades.

32. WWE and the McMahons knew about, tolerated, and at least tacitly (and arguably expressly) approved of a culture of sexual misconduct, particularly via the actions of WWE executives and Vince McMahon himself. Sexual misconduct permeated the organization from the top down and infected the organization to its rotten core.

33. The rampant sexual abuse is exemplified by myriad allegations that have since been made public against the WWE's looming kingpin—Vince McMahon—and other top executives, including those detailed in a sex trafficking lawsuit filed by former WWE employee, Janel Grant.

34. The serious nature of the misconduct was also disclosed in corporate annual reports for Defendant TKO Group Holdings, Inc., which now owns and operates the WWE.

35. Allegations of Ring Boy abuse were first publicly revealed in 1992 by a pair of Ring Boys, Tom Cole and Chris Loss, in what became known as the Ring Boy Scandal. Accusations of sexual abuse were specifically made against Phillips and two other WWE executives, Terry Garvin (a.k.a. Terry Joyal, a Vice President of Operations and Phillips's supervisor) and Pat Patterson (who was often known as Vince McMahon's right-hand man and close confidante).⁹ The accusations led to Phillips and Garvin "leaving" WWE and Patterson resigning, only to quickly return.

36. Following a review of hundreds of pages of court records, Freedom of Information Act requests, and more than half a dozen interviews, Business Insider¹⁰ reported that the McMahons, while publicly expressing shock and concern over the Ring Boy Scandal allegations, actually knew about and tolerated the abuse for years.

⁹ See *WWE*, "Pat Patterson", <https://www.wwe.com/superstars/patpatterson> (last visited Oct. 21, 2024).

¹⁰ *Business Insider*, "WWE cofounder Linda McMahon, who runs Trump's biggest super PAC, once hired a suspected child molester on the condition that he 'stop chasing after kids.' He didn't.", <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024).

37. “It was a crazy time in the company,” said one former high-level employee.¹¹ He revealed that “[t]he boys that the company hired to put up the ring and so forth, were being . . . *had* [that is, abused] by some of the folks who were in the wrestling [operations] side of things. ***And it was just generally known, by everybody, that it was going on.***” (emphasis added). “It was a mess. It was an absolute mess,” he continued, his voice breaking a bit. The employee further said that the McMahons “clearly knew what was going on, but really did nothing to stop it. . . . There was not a damn thing we could do about it.”

38. In the book *Sex, Lies & Headlocks: The Real Story of Vince McMahon and World Wrestling Entertainment*, the authors report that Nelson Sweglar, then the WWE’s operations manager, “remembers walking into a bus and seeing Garvin, whom he found likable, ‘hard at it’ with a ring boy.” Sweglar was quoted as follows regarding the Ring Boys’ abuse: “**Everyone knew what was going on, but it would have taken someone within the brotherhood to have moved on it. And none of the people who knew about it moved on it.**” (emphasis added).

39. The book also recounts Mel Phillips carrying around the country a black book with the names of kids who he would call when the WWE came to town, noting that the kids were usually from broken homes.¹²

40. In a 1992 investigation into the Ring Boy Scandal, a magazine reported that Phillips “was once spotted in the backseat of a car in Pennsylvania performing a sexual act on an 11-year-

¹¹ *Id.*

¹² It is well known that a child’s family structure significantly impacts the risk of a child being sexually abused. Children living with only one parent, or a stepparent are at a significantly higher risk of being a victim of sexual abuse. See *Joshua Center on Child Sexual Abuse Prevention*, “What Places Youth at Risk?”, <https://uwjoshuacenter.org/what-places-youth-risk> (last visited Oct. 21, 2024). Research based on 72 different studies has identified 23 risk factors for child sexual abuse across seven risk themes; one risk theme is a “non-nuclear family structure.” *Id.*

old boy.” Former top WWE star, Bruno Sammartino told the magazine, “Vince McMahon was told about the incident, and he elected not to do anything.”¹³

41. Sammartino also publicly stated the same facts when he appeared on a 1992 taping of CNN’s “*Larry King Live*,” describing sexual harassment and abuse as common knowledge throughout the professional wrestling industry, particularly that everybody knew Phillips sexually abused little boys.¹⁴

42. Additional details of that incident were revealed during a 1992 taping of the “*Phil Donahue Show*”¹⁵ when wrestling icon, Superstar Billy Graham, said that he was present the night in Allentown, Pennsylvania in 1982 or 1983 when Phillips was spotted in a car with a child about 10–11 years old performing oral sex on him. Superstar Billy Graham said that a security guard brought the child into the arena and presented him to Vince McMahon and McMahon’s father. Vince McMahon and his father responded that “they would handle it.” They did not. Graham said, “This has gone on for so many years” and suggested that Vince McMahon knew of and ignored the abuse.

43. The magazine article, noted above, added that Phillips “was briefly suspended by the WWE several years later for a similar act,” demonstrating further that the McMahons knew about Phillips’s sexual abuse **before** Phillips was temporarily terminated in 1988.

¹³ *Business Insider*, “WWE cofounder Linda McMahon, who runs Trump’s biggest super PAC, once hired a suspected child molester on the condition that he ‘stop chasing after kids.’ He didn’t.”, <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024).

¹⁴ *YouTube*, “Vince McMahon and Bruno Sammartino on Larry King Live (1992)”, <https://www.youtube.com/watch?v=je5mokKJqkk> (last visited Oct. 21, 2024).

¹⁵ *Daily Motion*, “The Phil Donahue Show: WWF Drug Sex Scandal in 1992”, <https://www.dailymotion.com/video/x8ooc0s> (last visited Oct. 21, 2024); *ProWrestling Stories*, “WWF Drug and Sex Scandal That Rocked The Tabloids in 1992”, <https://prowrestlingstories.com/pro-wrestling-stories/wwf-scandal-1992/> (last visited Oct. 21, 2024).

44. And more specifically, Vince McMahon confessed to New York Post columnist, Phil Mushnick, that he and Linda McMahon knew of Phillips's "peculiar and unnatural interest" in boys *for years before* they temporarily fired him for it in 1988. Despite that knowledge, the McMahons knowingly put dozens of young boys in imminent harm's way by rehiring Phillips just weeks later with the "caveat" that Phillips was to steer clear from kids.

45. Mushnick wrote about the confession in a 1992 column.¹⁶ "Two weeks ago, during pour-his-heart-out phone calls," Mushnick wrote, "[Vince McMahon] told West Coast-based journalist Dave Meltzer, then me, that he had let Phillips go four years ago because Phillips's relationship with kids seemed peculiar and unnatural. McMahon said he re-hired Phillips with the caveat that Phillips steer clear from kids." Meltzer confirmed to Business Insider that this was an accurate account of his call with Vince McMahon.

46. During his interview in the "*Mr. McMahon*" Netflix docuseries, Meltzer also recounted talking to Mr. McMahon around the time that Phillips, Garvin, and Patterson left WWE, and Mr. McMahon tried to claim that only one of the three was innocent: Patterson. When Meltzer pressed McMahon on why Patterson was gone if he was supposedly innocent, Mr. McMahon accused Meltzer of not understanding how to run WWE's business.

47. Like Mr. McMahon, WWE's Executive Director Bruce Prichard¹⁷ tried to defend Patterson during his interview for the "*Mr. McMahon*" docuseries. But regarding Phillips and Garvin, he merely said "no comment." Below is a photo of Phillips taken by one of the John Does:

¹⁶ *New York Post*, "Sex Lies, and the WWF: WWF's Defense Just More Lies", <https://www.documentcloud.org/documents/6175271-Mushnick-Sex-Lies-the-WWF-Column-Re-Conversation.html> (last visited Oct. 21, 2024).

¹⁷ Prichard has been in various roles at WWE going back to 1987, such as executive, booker, manager, and occasional wrestler.



48. About a year later, on or about February 17, 1993, WWE and Vince McMahon brought a sham defamation lawsuit¹⁸ against Mushnick and the Post. In his sworn deposition testimony, Mushnick described what he said were detailed conversations with Vince McMahon where Vince acknowledged that he and Linda McMahon “*had known for some time* that Mel had a peculiar and unnatural interest and attachment to children, and as *we saw him going around and – with kids*, that Linda and I decided that this was wrong” and had fired him for it, only to let Phillips return to WWE out of pity. (emphasis added). In addition to all of the facts showing the in-depth knowledge of the McMahons regarding Phillips’s pedophilia sexual fetishes, the below-

¹⁸ The McMahons have a pattern and practice of retaliating whenever someone takes action against them in such a way that would make them look bad. The suit against Mushnick was yet another example of the scorched-earth practice of harsh retaliation intended to silence any criticism and to avoid accountability.

pictured letter provides that the McMahons and their long-time attorney *were in receipt of the videotape noted in the FBI investigation in the year prior to suing Mushnick.*

KIRKPATRICK & LOCKHART
1500 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222-5179
TELEPHONE 412 355-8608
RCA TELE 4449
FACSIMILE 412 355-8608
FACSIMILE 412 355-8608

dskz
BOSTON MA
HARRISBURG PA
MIAMI FL
WASHINGTON, D.C.

WRITER'S DIRECT DIAL NUMBER
355-8608

February 17, 1993

CERTIFIED MAIL/RETURN
RECEIPT REQUESTED

Mr. John Maloof
P.O. Box 9
Derry, NY 03038

Dear Mr. Maloof:

I am returning to you the videotape of your film of the WWF events that you were kind enough to provide to us last year. On behalf of Titan, I thank you for sharing these with us. Should we have any need for the videotape in the future, I will be in touch.

With continued best regards, I remain

Yours very truly,
Jerry S. McDevitt
Jerry S. McDevitt

:lc
Enc.

49. Below are three photos of Phillips visiting a neighborhood filled with children, using WWE props and gear to lure children to him. In the first photo, Phillips's arms and a portion of his legs can be seen in the bottom left, surrounded by children, including one former Ring Boy (who is now deceased) holding the Iron Sheik's famous "Persian Clubs." In the second photo, another Ring Boy is shown holding a WWE championship belt in Phillips's car at a gas station while on a road trip with Phillips. Phillips would keep the WWE props and paraphernalia in the back of his car. In the third photo, two of the underaged boys pose with the same belt, simulating

a wrestling move where the one boy was “smashing” the other over the head with the belt.





50. “He told me that he was returned by Linda,” Mushnick testified. “Vince and Linda returned Phillips to the organization with the caveat that Mel steer clear of underaged boys, stop hanging around kids, and stop chasing after kids.” Mushnick testified that Vince McMahon said he brought him back, because Phillips “really missed the wrestling” and “really missed the scene.”

51. Mushnick further testified that Vince McMahon told him that he saw Phillips with these kids all the time.

52. In his deposition, Mushnick testified that he had talked to Vince about other rumored victims of abuse within WWE beyond the two Ring Boys who went public in 1992. He recalled mentioning a specific name to Vince, a teen boy Mushnick said was referred to within WWE as “Mrs. Mel Phillips.” As Mushnick remembered it, Vince responded, “[T]hat’s [Phillips’s] guy, but he has his parents’ permission to be with Mel.”

53. Mushnick also testified as follows regarding his conversation with Vince McMahon regarding the obvious red flags associated with Phillips transporting a child from upstate New York to Baltimore:

(24) And then I said to him, and you had to
(25) have known, you had to have known that Garvin and

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(1)
(2) Patterson and Phillips were doing this, because you
(3) were on the road. You saw this stuff. You heard
(4) this stuff going around. Everybody knows that
(5) there was joking going on about Mel Phillips' foot
(6) fetish. Everybody knew that there were kids on the
(7) road who didn't belong there, kids who were
(8) probably underage and what were they doing – why
(9) was it important to have a kid from upstate
(10) New York in Baltimore? Why don't you just pick up
(11) a kid for the night to hold a wrestler's robe in
(12) Baltimore? Why did Mel Phillips have to schlepp
(13) these kids all around the country?
(14) Q. What did he say?
(15) A. He said to me that's why we have gotten
(16) rid of them, meaning all three of those guys. He
(17) said to me that's why we have gotten rid of them.

54. In the “*Mr. McMahon*” docuseries, Mushnick described Phillips as the ring boss who would bring with him Ring Boys who were often underage and were being sexually abused. Mushnick also noted that he learned that Phillips, Garvin, and Patterson were in a pedophile ring.

55. Mushnick added, “These were real kids being sexually abused on McMahon’s watch,” and “I think Vince is guilty of aiding and abetting the Ring Boy Scandal. At best, he’s guilty of rank neglect.”

56. Business Insider¹⁹ reported Vince McMahon’s acknowledgement—as described by Mushnick—that he and Linda McMahon fired, but then rehired, Phillips in 1988. This is further supported by video evidence: Phillips disappeared from his post on the syndicated “*Wrestling Challenge*” TV show after a March 1988 taping but reemerged for a live broadcast merely six weeks later at Boston Garden.

57. Business Insider reported that WWE never publicly acknowledged his absence at

¹⁹ *Business Insider*, “WWE cofounder Linda McMahon, who runs Trump’s biggest super PAC, once hired a suspected child molester on the condition that he ‘stop chasing after kids.’ He didn’t.”, <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024).

the time, but Phillips's former friend, who spoke with Insider, added that Phillips never mentioned the 1988 firing until the McMahons dismissed him again in 1992.²⁰

58. On information and belief, when Phillips was fired in 1992, Vince McMahon told him to go quietly so the Ring Boy Scandal would blow over. The WWE and/or the McMahons also gave Phillips a lump sum payment of around \$300,000.

59. Vince's confessions as to the McMahons' knowledge of Phillips's misconduct is corroborated by the former high-level WWE employee who told Business Insider that ". . . **it was just generally known, by everybody . . .**" that abuse of the Ring Boys was occurring, and the source suspected that **the McMahons** "clearly knew what was going on, but really did nothing to stop it." (emphasis added).²¹

60. In addition to the highest-level executives, multiple WWE wrestlers knew about Mel Phillips's abuse of the Ring Boys:

A. Jake "the Snake" Roberts, a former professional wrestler with WWE from 1986 through 1992 and again from 1996–1997, said during an interview regarding the Ring Boy Scandal that "it was all true," particularly involving Phillips and Terry Garvin. He specified that he knew "it was going on" and it made him "sick." He said, the "story goes that Gorilla Monsoon caught Phillips putting his figure four on some kid and sucking his toes." "Pretty disgusting."²²

B. Sid Raymond Eudy, a former professional wrestler under the ring names Sid Justice,

²⁰ *Id.*

²¹ *Id.*

²² *YouTube*, "Jake The Snake Roberts on the WWF Ring Boy Scandal", <https://www.youtube.com/watch?v=fW675PVAPFE&list=PLUnbMaSzdPeCqPF1v1NTuZIJ8RmPRmwpb&index=19> (last visited Oct. 21, 2024). A "figure four" is a wrestling grappling hold commonly used for submission.

- Sid Vicious, and Sycho Sid, who was with the WWE from 1991–1992, described an instance when there was a group of young boys outside the hotel. He asked The Warlord (another former wrestler with WWE from 1988–1992) what they were doing there, and The Warlord said that the ring announcer, Mel Phillips, was getting the kids tickets to the show tonight and before the show he takes them to the hotel room and plays with their feet. Sid added, “I can tell you a million stories like that.”²³
- C. Greg “the Hammer” Valentine, a former professional wrestler with WWE from 1978–1979, 1981–1982, and 1984–1992, said he heard about Mel Phillips sucking on toes, and he heard a lot of strange things that happened with the Ring Boys. Before it became public in 1992, “no one cared, you know I mean if he wants to suck toes let him,” but he did hear that Phillips got some younger kids involved and said there’s definitely a big problem with that.²⁴
- D. Sabu, a former professional wrestler with various promotions in the 1980s and with WWE in 1993, said that WWE at the time would hire ring crew guys under 18, and Mel Phillips was a pervert. Phillips “had kids in every town,” that’s why he was “so notorious,” and Phillips “was a foot guy” that would use boys’ feet for sexual pleasure—“he didn’t deny it, he just faded away.”²⁵
- E. Shane Douglas, a former professional wrestler with WWE in and around 1986,

²³ *YouTube*, “Sid on Former WWE Ring Announcer Mel Phillips Interest in Young Boys”, <https://www.youtube.com/watch?v=HEYPPBYwszY&list=PLUnbMaSzdPeCqPF1v1NTuZIJ8RmPRmwpb&index=23> (last visited Oct. 21, 2024).

²⁴ *YouTube*, “Greg Valentine on ring announcer Mel Philips sucking on boys toes”, https://www.youtube.com/watch?v=16cRh7_bORM&list=PLUnbMaSzdPeCqPF1v1NTuZIJ8RmPRmwpb&index=92 (last visited Oct. 21, 2024).

²⁵ *YouTube*, “Sabu on the Biggest Perverts in Pro Wrestling”, <https://www.youtube.com/watch?v=nH4tLyR8IS0&list=PLUnbMaSzdPeCqPF1v1NTuZIJ8RmPRmwpb&index=22> (last visited Oct. 21, 2024).

remembers that on a flight from California to Honolulu, he saw a couple younger kids join Mel on the plane. Then, during the flight when most people were asleep, he walked past Mel's seat and saw Mel stare at him with a blanket pulled up to his chin and saw the blanket moving up and down near his crotch, which appeared to be Mel engaging in a sexual act under the blanket with one of the younger boys on the plane.²⁶

- F. The Honky Tonk Man, a former professional wrestler with WWE from 1986 to 1991, talked about a lot of the abuse going on with the Ring Boys.²⁷
- G. Brickhouse Brown, a former professional wrestler with multiple promotions including WWE in the summer of 1986, informed former professional wrestler Rob Van Dam (who was with WWE from approximately 2001 to 2007) and other wrestlers about Phillips molesting the Ring Boys and other sexual harassment by WWE executives Patterson and Garvin.²⁸
- H. Gorilla Monsoon, a former professional wrestler, commentator, and backstage manager for WWE during the 1980s and 1990s, said during a taping: "As Mel Phillips would say that match will knock your socks off" – seemingly a reference to Phillips's foot fetish.²⁹

²⁶ *YouTube*, "Shane Douglas on the SHOCKING thing Mel Philips did on a Plane!", <https://www.youtube.com/watch?v=fIM7PrfT9k&t=59s> (last visited Oct. 21, 2024).

²⁷ *YouTube*, Pat Patterson: Leader of the Gang, https://web.archive.org/web/20240827221244/https://www.youtube.com/watch?v=AgFRZ_-gftQ (previously available); see also <https://music.amazon.co.uk/podcasts/5dfa3092-5e32-44ad-a347-71d953219c78/episodes/1978f17e-1235-4ecf-aa93-ba5d610da6d4/wrestling-shoot-interviews-pat-patterson-leader-of-the-gang-it-was-all-true-vince-mcmahon-should-have-been-in-prison-decades-ago> (last visited Oct. 20, 2024).

²⁸ *Id.*

²⁹ *YouTube*, "Gorilla Monsoon Name Drops Mel Phillips", <https://www.youtube.com/watch?v=VUJEU7G13UY&list=PLUnbMaSzdPeCqPF1v1NTuZIJ8RmPRmwpb&index=90> (last visited Oct. 21, 2024).

I. Tito Santana, a former professional wrestler with WWE in 1979-80 and 1983-1993, wrote about Phillips in his book *Don't Call Me Chico*, describing Phillips as in charge of the ring crew and seeing him “with his collection of local ‘ring boys’ [Phillips] brought to the show to help set up chairs and the whole deal. Wherever the WWF went, Mel Phillips added to his list of teen helpers from broken homes and troubled backgrounds.” Santana saw Phillips wrestling the ring boys.

61. WWE Hall of Fame wrestler, Bret Hart, gave an interview for the “*Mr. McMahon*” docuseries where he said, “Mel Phillips was a total pedophile that preyed on young boys and if these young boys weren’t complying with [his] requests for sexual favors they weren’t hired.”

62. Hart also claimed in his 2007 autobiography, *Hitman: My Real Life in the Cartoon World of Wrestling*, that both Garvin and Phillips, as well as Pat Patterson, resigned “as a result of the allegations of sexual misconduct.” Hart detailed an incident involving Phillips engaging in unwanted conduct that then became known to Vince McMahon, Pat Patterson, and other wrestlers:

Vince arrived with Pat, Howard Finkel, Terry Garvin and a black ring announcer named Mel Phillips. Mel was something of a whipping boy for all of them, and before long Vince and Pat were doing everything they could to get Stu to stretch him in the dungeon. Stu thought they only wanted to make fun of Mel, and at first he wouldn't go for it.

A couple of months earlier, on a bus ride somewhere in Europe, Mike Tomay, a rookie referee, made the mistake of confiding to Jacques Rougeau that one night when he shared a room with Mel Phillips he was awakened by Mel straddling him buck naked at the foot of his bed and sucking hard on his big toe!

"Then what happened?" Jacques asked.

Mike said, "I told him I didn't like it and to stop, and he did."

Between fits of laughter Jacques told everybody on the bus. Of course none of us could stop laughing either. When we got back to the States I had little choice but to immortalize the incident on the blackboard, adding Mel to the long-standing, ever-changing orgy with Princess Tomah and Chief. Mic in hand and still wearing his announcing tuxedo, Mel Phillips hung by his lips from Chief's big toe! This was a big hit with the boys, so I drew it everywhere for a while.

After an hour of prodding from Vince and Pat, Stu was finally persuaded to get his hooks on Mel. From the kitchen, we could hear sharp screams followed by giddy laughter and grunting coming from downstairs. I hurried down to find Mel stripped down to his undershirt, slacks and socks, and inquired whether he wanted Stu to show him how to put on a flying toe hold. Neither Vince nor Pat wanted to get too close: Stu stretching either one of them would have been a beautiful thing to watch, and they knew it. Stu let Mel off easily enough, climbing

off him like a forgiving spider. It turned out to be a wonderful evening for everyone, except maybe for Mel Phillips.

63. WWE's executives, particularly Terry Garvin and Pat Patterson, also knew or should have known about Phillips's misconduct. Indeed, Garvin and Patterson were allegedly engaging in similar misconduct and were part of the pedophile ring, as stated by Mushnick.

64. In a New York Times bestselling book titled *Sex, Lies, and Headlocks: The Real*

Story of Vince McMahon and World Wrestling Entertainment,³⁰ Nelson Sweglar, who was WWE's company operations manager, remembers walking into a bus and seeing Garvin "hard at it" with one of the Ring Boys. "These were kids that were usually from broken homes whose parents would only be too glad to send them off to do a day's work." **"Everyone knew what was going on,"** continued Sweglar, "but it would have taken someone within the brotherhood to have moved on it. And none of the people who knew about it moved on it." (emphasis added).

65. In 1992, on the "*Phil Donahue Show*,"³¹ Tom Hankins (a former wrestler), Bruno Sammartino (a former wrestler), Superstar Billy Graham (a former wrestler), and Barry Orton (a former wrestler) all confronted Vince McMahon by airing claims of alleged sexual misconduct by WWE employees, particularly Terry Garvin, Pat Patterson, and Mel Phillips, who by that time had all been let go by the company.

66. Orton discussed being propositioned in 1978 at 19 years old. Orton also said that he had heard about stories with Garvin and underaged kids, and that this kind of conduct was a common topic of conversation every night in the dressing room because the guys had to put up with the harassment and hated it because, if they were to say anything, then they'd be out of a job.

67. Orton also discussed a car ride where Patterson and Garvin groped him, as well as Patterson standing outside the wrestlers' shower area where Patterson would lurk and lick his lips.

68. Orton passed a polygraph regarding his allegations.

69. Orton also stated that Vince McMahon knew about it because he's the "king of the

³⁰ Shaun Assael, "Information Page: *Sex, Lies, and Headlocks: The Real Story of Vince McMahon and World Wrestling Entertainment*", <https://shaunassael.com/sex-lies-and-headlocks/> (last visited Oct. 21, 2024).

³¹ *Daily Motion*, "The Phil Donahue Show: WWF Drug Sex Scandal in 1992", <https://www.dailymotion.com/video/x8ooc0s> (last visited Oct. 21, 2024); *ProWrestling Stories*, "WWF Drug and Sex Scandal that Rocked The Tabloids in 1992", <https://prowrestlingstories.com/pro-wrestling-stories/wwf-scandal-1992/> (last visited Oct. 21, 2024).

empire” and has “eyes and ears everywhere.”

70. During the show, McMahon admitted that there’s a possibility of sexual harassment at WWE.

71. Orton maintained that he never moved up in the organization because he spoke out about what happened. He also said that a Ring Boy came up to him in Chicago and asked what he should do about Garvin’s harassment.³²

72. Former wrestler, Tom Hankins, detailed an incident that occurred in 1985 in Los Angeles after a WWE event—he was sitting in a bar drinking with Pat Patterson who told him the only way Hankins was getting booked “to run a job” was if he performed oral sex on Patterson. According to Hankins, he tried to reach McMahon to disclose what happened and could never get through, but he told anyone he could about what happened to him.

73. Former wrestler Billy Graham detailed Ring Boys being sexually harassed. Graham said the Ring Boys were young men aged 13–20 who were employed to help put up and take down the ring and traveled from one town to the other.

74. In his interview for the “*Mr. McMahon*” docuseries, Dave Meltzer, editor of the Wrestling Observer Newsletter, recounted sitting next to Mr. McMahon during part of the “*Phil Donahue Show*” when McMahon was being confronted about claims of sexual misconduct and that McMahon whispered to him, “this is the longest hour of my life.” Meltzer described Mr. McMahon as uncomfortable. Even Mr. McMahon’s daughter, Stephanie McMahon, said in her

³² *WWF OldSchool*, “Pedophiles in Professional Wrestling”, <https://wwfoldschool.com/pedophiles-professional-wrestling-wwf/2/> (last visited Oct. 21, 2024); *YouTube*, Pat Patterson: Leader of the Gang, https://web.archive.org/web/20240827221244/https://www.youtube.com/watch?v=AgFRZ_-gftQ (previously available); see also <https://music.amazon.co.uk/podcasts/5dfa3092-5e32-44ad-a347-71d953219c78/episodes/1978f17e-1235-4ecf-aa93-ba5d610da6d4/wrestling-shoot-interviews-pat-patterson-leader-of-the-gang-it-was-all-true-vince-mcmahon-should-have-been-in-prison-decades-ago> (last visited Oct. 20, 2024).

interview for the docuseries that the "Donahue Show" was an opportunity for her father to stand up for himself, but it did not go the way he wanted it to.

75. Former wrestler Billy Graham stated the following in a March 3, 1992, interview with Tom Cole's first attorney:

A: OH, WELL, I'VE NEVER SEEN AN ACTUAL HOMOSEXUAL ACT BETWEEN A RING BOY OR TERRY GARVIN OR PAT PATERSON OR MEL PHILLIPS, BUT I KNEW THAT THEY CONTROLLED THEM. I KNEW THAT THEY... THEY WOULD COME UP, AND I HAVE SEEN MANY OCCASSIONS WHEN A RING BOY WOULD BE PUTTING UP... WOULD BE WALKING BY, AND LIKE, MYSELF WALKING INTO THE ARENA EARLY OR SOMETHING, AND PAT PATERSON OR TERRY GARVIN WERE THERE AROUND THE RING, AND I WOULD SEE THEM BEND OVER AND GRAB THEIR ASS IN A SEXUAL SUGGESTIVE MANNER. UH... AND UH... IT SEEMED LIKE THEY HAD LIKE, TOTAL DOMINENCE OVER THESE KIDS, AND IT WAS... IT WAS COMMON KNOWLEDGE, YOU KNOW, IT WAS VERY COMMON KNOWLEDGE THAT THESE KIDS WERE BEING USED AS PAWNS FOR MEL PHILLIPS AND PAT PATERSON AND TERRY GARVIN.

Q: OKAY. UH... DO YOU... DO YOU THINK THAT IN A SENSE THAT THESE YOUNGSTERS WERE PREYED UPON BY THE OWNERS AND MANAGEMENT OF THE WWF THEN?

A: YES. THERE'S NO QUESTION THEY WERE PREYED UPON. THEY WERE LIKE UH... THEY WERE LIKE UH... YOU KNOW, THEY WERE THE... THEY WERE THE... THEY WERE PREYED UPON, YES. THEY WERE VICTIMS. THEY WERE PREYED UPON AND THEY WERE VICTIMS, YOU KNOW, THEY WERE VICTIMIZED. YOU KNOW, THIS HOMOSEXUAL HARRASSMENT, THEY WERE VICTIMIZED BY THESE EMPLOYEES OF THE WWF. AND, AND, UH... KNOWINGLY VICTIMIZED BY VINCE MCMAHON.

76. Other former WWE wrestlers have spoken out about the sexual harassment from WWE executives. Brickhouse Brown detailed an incident when Pat Patterson propositioned him in an elevator, which disturbed him. Brown then told every wrestler friend of his what had happened (e.g., famous wrestlers Macho Man Randy Savage and Ric Flair) who all asked him “how bad do you want it” for your career and told him sometimes you have to play the game (i.e., engage in sexual favors).³³ Tony Garea³⁴ told him, “sometimes it’s not who you know, it’s who you blow.” Brickhouse Brown didn’t go to Vince McMahon about Patterson because he felt like Vince had to already know what was going on and Vince would have taken Patterson’s side since he (Brickhouse) was replaceable, but Patterson wasn’t.

77. Shane Douglas described an incident in the locker room when Patterson touched him inappropriately in his pubic area, and he said that it was fairly common in the wrestlers’ dressing room to hear these types of stories.³⁵

78. WWE Hall of Famer Anthony White “Tony Atlas” said during his interview for the “*Mr. McMahon*” docuseries, “We all knew Pat [Patterson] was doing this stuff. I didn’t like Pat because he kept grabbing my pecker [penis] in the locker room.” When asked if the wrestlers complained, he said, “To who? [Pat] is the booker, the number two guy in the office.” “There’s nobody to go to, son. You either take it or you go home.”

³³ *YouTube*, “Brickhouse Brown On Allegations Against Pat Patterson & The Deeper Rabbit Hole That Goes Beyond Him!”, <https://www.youtube.com/watch?v=nm03nUlylGo> (last visited Oct. 21, 2024).

³⁴ A former professional wrestler with WWE in the 1970s and 1980s and also a road agent for WWE until around 2014.

³⁵ *YouTube*, Pat Patterson: Leader of the Gang, https://web.archive.org/web/20240827221244/https://www.youtube.com/watch?v=AgFRZ_-gftQ (previously available); see also <https://music.amazon.co.uk/podcasts/5dfa3092-5e32-44ad-a347-71d953219c78/episodes/1978f17e-1235-4ecf-aa93-ba5d610da6d4/wrestling-shoot-interviews-pat-patterson-leader-of-the-gang-it-was-all-true-vince-mcmahon-should-have-been-in-prison-decades-ago> (last visited Oct. 20, 2024).

79. Former professional wrestler Dutch Mantel, who was with several wrestling promotions including the WWE in the mid-1990s, described such stories and the situation in those days as “just a day at the office.”³⁶

80. In 1992, on the show “*Now It Can Be Told*,”³⁷ several people were interviewed who all alleged sexual harassment within WWE: Michael Clark (a former referee for multiple years) and Rita Chatterton (the first female referee). Their allegations involved a “casting couch” for wrestlers (*i.e.*, sexual favors in exchange for money, jobs, and promotions) and executives taking Ring Boys on the road as young companions.

81. Clark said that on his first day of full-time work in 1987 for the WWE, his boss told him if he had any problem with Pat Patterson or Terry Garvin to come to him (suggesting that he and others knew about their actions). Clark claimed that Garvin asked him to perform oral sex on Garvin in exchange for Garvin getting Clark booked as a referee throughout Canada, getting Clark a green card so he could work in the United States, and also giving him \$500. When Clark refused, his career with the WWE was over. Clark claimed there was a crew of referees and Ring Boys who were being coerced to perform sexual favors for WWE management, headed by Garvin and Patterson, who were known as “The Cream Team.” Clark called Phillips the sickest of the three.³⁸

³⁶ *YouTube*, Pat Patterson: Leader of the Gang, https://web.archive.org/web/20240827221244/https://www.youtube.com/watch?v=AgFRZ_-gftQ (previously available); *see also* <https://music.amazon.co.uk/podcasts/5dfa3092-5e32-44ad-a347-71d953219c78/episodes/1978f17e-1235-4ecf-aa93-ba5d610da6d4/wrestling-shoot-interviews-pat-patterson-leader-of-the-gang-it-was-all-true-vince-mcmahon-should-have-been-in-prison-decades-ago> (last visited Oct. 20, 2024).

³⁷ *YouTube*, “Geraldo 4/13/1992 – ‘Sex Scandals of the Season’ (with Rita Chatterton, Murray Hodgson, & others)”, <https://www.youtube.com/watch?v=deVZ-zQIHNQ&t=4s> (last visited Oct. 21, 2024).

³⁸ “Transcript of the Geraldo Rivera show dated April 3, 1992”, <https://s3.documentcloud.org/documents/6956593/Now-It-Can-Be-Told-Wrestling-s-Ring-of-Vice.pdf>.

82. In a recent 2024 interview with NewsNation,³⁹ former professional wrestler Paul Roma, who was with WWE from 1984 until around 1991, commented that he heard sexual misconduct allegations “on a regular basis,” including the people Vince McMahon had surrounding him. Vince McMahon had a lot of people around him like Vice Presidents and bookers that were very much into abusive and harassing behavior and put wrestlers in a bad situation. Some wrestlers, including Roma’s former partner, walked away after being asked to do sexual favors with other men; either do it or get fired. He said that it had to be the WWE executives propositioning wrestlers because they’re the ones who could and did offer the wrestlers money/jobs.

83. When WWE released a *History of WWE* DVD, it edited out Phillips by showing the historic Wrestlemania III match between Hulk Hogan and André the Giant only from a singular camera angle and without commentary.⁴⁰ An allegedly reliable source from WWE said the odd editing was due to the presence of Phillips in the background of that match.⁴¹ Phillips has supposedly also been edited out of other WWE archived video footage. Such editing, particularly of such a historic event, is the WWE’s further acknowledgement of Phillips’s sexual misconduct and WWE’s attempt to scrub Phillips from its history in order to protect the business at all costs.

84. There are also reports that Phillips was edited out of various shows on WWE’s

³⁹ *YouTube*, “Former WWE star Paul Roma details sexual misconduct involving wrestlers | Banfield”, <https://www.youtube.com/watch?v=9gh65UwysLU> (last visited Oct. 21, 2024).

⁴⁰ In the “*Mr. McMahon*” docuseries, Vince described this as probably the biggest attraction WWE ever had and something he’s “very very proud of today.”

⁴¹ *Wrestling Inc.*, “WWE Trying to Erase A Former Ring Announcer? – Historic WrestleMania Match Edited for DVD”, <https://www.wrestlinginc.com/news/2013/12/wwe-trying-to-erase-a-former-ring-announcer-historic-567881/> (last visited Oct. 21, 2024).

streaming video platform, including an October 1983 show at the Spectrum in Philadelphia.⁴²

85. Before WWE tried to scrub Phillips from its dark history, Phillips was a prominent and highly visible employee.

86. The foregoing admissions and accounts establish not only that Defendants knew or should have known about Phillips's sexual harassment and abuse of the Ring Boys, but that Defendants failed to protect the Ring Boys and knowingly fostered and allowed a culture of sexual misconduct to permeate the WWE which empowered Phillips, Patterson, and Garvin to abuse underaged boys, including Plaintiffs.

B. Several Ring Boys Previously Revealed Sexual Abuse of Minors Within WWE, Including by Phillips.

87. On May 4, 1992, John Arezzi published a Pro Wrestling Spotlight newsletter in which he wrote a column titled "Mat Memories" detailing his personal memories of Phillips going back to the 1970s.⁴³ Arezzi described Phillips as being "in the middle of the most sickening scandal in the history of professional wrestling." In the mid-1970s, Arezzi met Phillips when Phillips was a "ring boy" for the WWE, and his goal was to be a ring announcer. Arezzi and Phillips became friends, and Phillips later visited Arezzi at college where Arezzi "began to notice a strange habit of Mel's. He would always seek out one of [Arezzi's] best friends at school and 'wrestle' him." When spending New Year's Eve of 1975 with Arezzi and his family, Phillips showed off a new

⁴² *Freakin' Awesome Network*, "Thread for WWE Network Edits", <https://officialfan.proboards.com/thread/493052/thread-wwe-network-edits?page=44> (last visited Oct. 21, 2024).

⁴³ Arezzi was also known for a popular Pro Wrestling Spotlight radio show during the late 1980s to mid-1990s that discussed the inside of the wrestling business. *See Internet Archive*, "John Arezzi on Mel Phillips (Pro Wrestling Spotlight Newsletter, Nov. 4, 1992)", [https://archive.org/details/6560726-John-Arezzi-on-Mel-Phillips-Pro-Wrestling#:~:text=John%20Arezzi%20on%20Mel%20Phillips%20\(Pro%20Wrestling%20Spotlight%20N%20ewsletter%2005](https://archive.org/details/6560726-John-Arezzi-on-Mel-Phillips-Pro-Wrestling#:~:text=John%20Arezzi%20on%20Mel%20Phillips%20(Pro%20Wrestling%20Spotlight%20N%20ewsletter%2005) (last visited on Oct. 9, 2024).

video tape camera and recorder, which was rare for consumers at the time. During the summer of 1976, Phillips visited Arezzi in New York on a handful of occasions and was accompanied on those trips by a young boy about 15 years old. When Arezzi questioned Phillips about the boy, Phillips said he was underprivileged with a bad home life and Phillips was looking out for him. During those visits, Phillips “would always wind up ‘wrestling’ with [Arezzi’s] neighbor’s two young boys.” From the winter of 1976 through the next few years, Arezzi noticed Phillips around more and more young boys, which seemed strange. After January 1978, when Arezzi traveled to the Northeast, he would bump into Phillips, who “was always preoccupied with his group of ring boys that he was now supervising.” Arezzi ended his column by saying, “I just hope [Phillips] seeks some professional help.”

88. On July 24, 1992, the Three Count Professional Wrestling Newsletter published an article titled “Spotlight On: Cheryl Vasquez,” which detailed a July 12, 1992, conversation between Ms. Vasquez and the hosts of “*Wrestle Talk*,” a radio show. Ms. Vasquez, a mother, led a protest at a WWE event in New York because of sex abuse allegations by Ring Boys. Ms. Vasquez described how she knew and befriended many of the underaged Ring Boys from the upstate New York area, many of whom came from dysfunctional families, due to attending WWE shows with her own kids where they would all try to get autographs and pictures with the wrestlers. Many times, she went with her kids to the restaurants where the wrestlers and Vince McMahon would eat after the shows, and Phillips would also be present with Ring Boys. She asked the Ring Boys why they were always with Phillips, and they told her that they stayed in hotels with him which was particularly strange for the Ring Boys who lived in the area. She also learned that they sometimes went to the WWE office in Connecticut, where there was a big blow-up sex doll nicknamed “Big John.” She felt like the kids she knew were victims, and she provided information to the authorities. She contacted one

such Ring Boy, who she met about seven years prior, about attending her 1992 protest, but he told her he was in contact with the then-suspended Mel Phillips and the WWE’s attorney Jerry McDevitt and that he was no longer allowed to talk to her.

89. In 1992, Tom Cole and Chris Loss—two former Ring Boys—went public with accusations of sexual abuse that occurred when they were minors, just one small chapter in the widespread Ring Boy abuse scandal.

90. In a recent book called *Ringmaster: Vince McMahon and the Unmaking of America*, author Abraham Josephine Riesman recounts the allegations of Tom Cole from the early 1990s.⁴⁴ When Cole was 13 years old, he met Phillips, became a Ring Boy, and Phillips soon took him to wrestling shows in multiple cities, including New York, Baltimore, Boston, and Philadelphia. Phillips had young boys waiting for him at the shows. Years later, in a draft legal complaint,⁴⁵ Cole alleged that Phillips would frequently caress his feet and rub them against Phillips’s genitals.

91. In March 1992, Cole’s attorney sent the draft complaint to WWE counsel, Jerry McDevitt, setting out the allegations by Cole. The allegations were substantially similar to the allegations in the FBI investigation and the allegations of the Plaintiffs herein. Cole alleged he was employed as a *per diem* Ring Boy from 1985 until February 1990. It also detailed that he was not the only one who was subjected to the sexual misconduct of Phillips and others. Cole was terminated after he refused to engage in sexual acts with Terry Garvin.

92. Cole described Mel Phillips having a black book with names of kids from all over the country. Phillips would call these young boys when he was in a specific town and ask them if

⁴⁴ *Rolling Stone* magazine published an excerpt of the book. *Rolling Stone*, “Abuse, Grooming, and Sexual Coercion: The Scandal Wrestling Buried”, <https://www.rollingstone.com/culture/culture-features/ringmaster-vince-mcmahon-excerpt-1234696067/> (last visited Oct. 21, 2024).

⁴⁵ “The Tom Cole Unfiled 1992 Complaint”, <https://www.documentcloud.org/documents/3759217-Tom-Cole-Unfiled-1992-Complaint.html> (last visited Oct. 10, 2024).

they wanted to go to the shows as a way of grooming them for sexual abuse.

93. Cole further stated in an interview that Pat Patterson would make sexual gestures to him and touch his genitals and buttocks.⁴⁶ Cole also alleged in the draft legal complaint that Terry Garvin solicited sexual activity from him in 1988, when he was just 16 years old.

94. Cole contacted another former Ring Boy, Chris Loss, who had a similar experience being recruited by Phillips at a young age and having his feet sexually fondled. They both went public to the San Diego Union-Tribune in 1992, with Loss stating, among other things, “Boys are getting propositioned and played with all the time,” adding, “you sort of put up with it because you can make a lot of money.”⁴⁷

95. After Cole’s attorney faxed a courtesy copy of a threatened lawsuit to Vince McMahon’s attorney, the parties met in-person in or around March 1992 to discuss settlement.

96. After that, Cole met with Linda McMahon, Vince McMahon, and WWE counsel, Jerry McDevitt, who influenced the young Cole to accept \$55,000 in back pay and his being re-hired at WWE in exchange for dropping his anticipated lawsuit. One aspect of the deal was that Vince promised Cole that Patterson, Garvin, and Phillips would not be a part of WWE any longer (Vince later begged Cole to allow Patterson to return). At points during that meeting, Cole’s new attorney left the room. While his attorney was absent, Vince McMahon convinced Cole to take a deal. The parties continued to discuss the details of the deal. During that meeting, Vince confided

⁴⁶ See, e.g., *YouTube*, “Local Interview with Tom Cole Protest Outside WWF”, <https://www.youtube.com/watch?v=zCq8t5rDhVQ&t=24s> (last visited Oct. 21, 2024).

⁴⁷ *Business Insider*, “WWE cofounder Linda McMahon, who runs Trump’s biggest super PAC, once hired a suspected child molester on the condition that he ‘stop chasing after kids.’ He didn’t.”, <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024).

to Cole that he (Vince) had also been molested a child and that is why he knew what the young Cole was going through.

97. At a subsequent meeting at WWE headquarters, Cole was isolated with Linda McMahon where Linda asked Cole what the passcode was for his brother's answering machine (Cole and his brother were living together at the time).

98. On information and belief, the McMahons then accessed the answering machine and learned information that they later used against Cole.

99. During discussions, Linda told Cole that she believed there was something wrong with Phillips and Garvin.

100. During a later meeting with Cole, Linda McMahon commented that they wanted to make things right with Cole.

101. Linda McMahon had a direct role in the settlement, including having her name on the payment memorandum for Cole's back pay, and was instrumental in influencing Cole to stay quiet and accept the deal.⁴⁸

102. Cole's rehiring by WWE did not last long; he was fired by Linda McMahon shortly thereafter. When Linda McMahon later ran for Senate, she contacted Cole and thanked him for not speaking out further.

103. Linda McMahon manipulated Tom Cole to get him to provide her information about the other individuals speaking out against the Ring Boy Scandal so that she could make back-door agreements so those individuals would recant their negative statements about WWE, the

⁴⁸ Cole lamented in a subsequent interview that he told Vince McMahon in the in-person meeting that he was not looking for money and just wanted his job back: "It was probably the stupidest thing I ever said," because "I believed what [Vince] was saying" about starting on a clean slate with Cole and taking care of everything. *Rolling Stone*, "Abuse, Grooming, and Sexual Coercion: The Scandal Wrestling Buried", <https://www.rollingstone.com/culture/culture-features/ringmaster-vince-mcmahon-excerpt-1234696067/> (last visited Oct. 21, 2024).

McMahons, and the sexual harassment and abuse of Phillips, Patterson, and Garvin.

104. A friend of Chris Loss's, who would sometimes accompany him to WWE shows, said that Phillips would put the boys in between his legs up near his groin area.⁴⁹ According to the transcript of an interview with Loss conducted in 1992 by Cole's attorney, the friend said Phillips showed them videotapes of teens wrestling in his backyard ring and spoke about a nationwide network of "friends" he liked to wrestle with. "He told us that he has done it to a lot of different people," the transcript reads. "He said that he had friends over in different states that would help him, and he has done it to them. He's told us that."⁵⁰

105. In 1999, Scott Hopkins filed a lawsuit against Titan Sports, Inc. (another prior incarnation of WWE) and Phillips "for injuries caused to him as a result of the Defendant Mel Phillips abuse of the Plaintiff, Scott Hopkins, when he was a minor child." Hopkins's complaint detailed how he met Phillips in May 1985 at a wrestling event, and Phillips told him that he could get in for free and go backstage with the wrestlers if Hopkins helped set up the ring. But during construction of the ring, Phillips would take Hopkins aside and play a "game" with him entailing Phillips sitting on top of Hopkins, taking his socks off, rubbing Hopkins' feet and toes against Phillips's crotch, and pulling Hopkins's toes apart until he screamed. Phillips offered to take Hopkins to other wrestling events, and he even met with Hopkins's parents to "assure" them that their child would be safe and well cared for at the events.

106. Hopkins further alleged in the complaint that Titan Sports (WWE) provided Phillips

⁴⁹ *Daily Dot*, "Former WWE ring boy comes forward about being sexually abused as a teenager by Mel Phillips", <https://dailyddt.com/posts/former-wwe-ring-boy-comes-forward-about-being-sexually-abused-as-a-teenager-by-mel-phillips> (last visited Oct. 21, 2024).

⁵⁰ *Business Insider*, "WWE cofounder Linda McMahon, who runs Trump's biggest super PAC, once hired a suspected child molester on the condition that he 'stop chasing after kids.' He didn't.", <https://www.businessinsider.com/linda-mcmahon-once-employed-an-accused-child-molester-2020-10> (last visited Oct. 21, 2024).

with a private room at the wrestling events. Phillips took Hopkins to additional wrestling events throughout 1986 and the Spring of 1987, and Phillips shared a room with Hopkins multiple times where he would rub Hopkins's genitals. He alleged that Titan Sports (WWE) knew or should have known that Phillips engaged in sexual contact with Hopkins, as well as other young children, and that Titan Sports facilitated the abuse by providing Phillips with a private room and failing to take reasonable steps to prevent the sexual abuse.

107. The court denied Titan Sports's motion to dismiss, and about five months later, all parties stipulated to a dismissal. On information and belief, a settlement was reached, because Hopkins cited a confidentiality agreement when contacted by *Business Insider* about the suit.⁵¹

C. The WWE's Culture of Tolerating and Fostering Sexual Misconduct Went All the Way to the Top of the Company.

108. Sexual misconduct at WWE was not limited to Phillips and WWE executives Terry Garvin and Pat Patterson. It reached to the very the top: Vince McMahon.

109. The WWE 2022⁵² Annual Report admitted that it could not guarantee that the actions of Vince McMahon would have a positive impact on the strategic interests of the business.

110. Both the 2022 WWE Annual Report and the 2023 TKO Annual Report⁵³ disclosed that, in June 2022, the WWE and its Board of Directors announced that a Special Committee of independent members of its Board of Directors was formed to investigate misconduct by Vince McMahon that had previously been hidden.

111. The Special Committee determined that payments McMahon agreed to make from

⁵¹ *Id.*

⁵² "WWE 2022 Annual Report", <https://corporate.wwe.com/f/docs/sec-filings/16360538.PDF> (last visited Oct. 21, 2024).

⁵³ "TKO 2023 Annual Report", https://s202.q4cdn.com/437702206/files/doc_financials/2023/ar/TKO-Annual-Report-2023.pdf (last visited Oct. 21, 2024).

2006 through 2022, totaling \$14.6 million dollars, were not appropriately recorded in the WWE's consolidated financial statements. Thereafter, the WWE determined that two additional payments, totaling \$5 million to cover up Vince McMahon's conduct, were also not appropriately recorded as expenses in the consolidated financial expenses.

112. Due to Vince McMahon's unrecorded expenses being material and WWE concluding that its internal control over financial reporting was not effective, the WWE amended its financial statements. In January 2024, Vince McMahon resigned his positions with TKO.

113. TKO and WWE also acknowledged that they may be subject to further inquiries and lawsuits due to Vince McMahon's conduct.

114. Indeed, the culture of sexual abuse at WWE was a potential "red flag" and political vulnerability as part of Linda McMahon's vetting prior to her appointment by Donald Trump as the United States Administrator of the Small Business Administration.⁵⁴ The document states, in pertinent part:

WWE's Alleged Culture of Sexual Abuse Background: McMahon's WWE has faced numerous complaints of sexual abuse. Lawsuits against the WWE from sexual assault accusers range from the early 1990s through the 2000s. • Is there anything the President-elect's team should know regarding issues of sexual assault at your former organization? • Is it possible current or former employees of the WWE could elevate new sexual assault accusations from their tenure at your company if you were to receive a prominent public position?

115. The document further lists multiple allegations of sexual harassment against WWE and its employees, including the following:

- In 1999, female wrestling star, Sable, sued WWE for sexual harassment;⁵⁵

⁵⁴ "Linda McMahon White House Vetting Documents – Background", <https://graphics.axios.com/docs/white-house-vetting-docs/Linda%20McMahon%20Backgrounder.pdf> (last visited Oct. 21, 2024).

⁵⁵ See also *People Magazine*, "Who Is Brock Lesnar's Wife? All About Rena 'Sable' Lesnar", <https://people.com/who-is-sable-brock-lesnar-wife-7966266> (last visited Oct. 21, 2024).

- Ring Boy Tom Cole said he was harassed by several WWE employees when he was a minor, including one employee who filmed him while fondling his feet and masturbating and another top WWE official who grabbed him in the genitals numerous times;
- Superstar Billy Graham and wrestler Billy Jack Haynes said sexual harassment by WWE administrators had become “openly ridiculous” by the mid-1980s;
- Former wrestler Barry Orton described several WWE executives offering pay raises and career advancement in exchange for sexual favors; and
- Former wrestler Nicole Bass filed a sexual harassment lawsuit against WWE in the early 2000s, including being groped and grabbed on a plane by a longtime WWE employee.⁵⁶

116. Like Phillips, Garvin, and Patterson, Vince McMahon and the WWE have been the subject of sexual misconduct allegations *for decades*.

117. In 2004, two flight attendants accused wrestlers of assault and harassment during a 2002 flight, which became known as the infamous “Plane Ride from Hell.” They sued, and the WWE settled out of court.⁵⁷

118. Former wrestler Tony Atlas said in his interview for the “*Mr. McMahon*” docuseries: “We would have been looked upon in today’s society as some of the worst human beings walking the face of the Earth. I mean, we abused the hell out of women—all of us did. You know, they were like a toy for us.”

119. Former wrestler Dwayne “The Rock” Johnson said in his interview for the docuseries, “We continued to go over the line in terms of taste. There were a lot of questionable

⁵⁶ See also *The New York Times*, “A Wrestler’s Lawsuit Dabbles in the Real and the Fake”, <https://www.nytimes.com/2002/09/22/nyregion/a-wrestler-s-lawsuit-dabbles-in-the-real-and-the-fake.html> (last visited Oct. 21, 2024).

⁵⁷ *The Sun*, “Fight Club WWE plane ride from hell: Boozy flight from the UK ended with multiple sackings, two law suits and claims of sexual harassment”, <https://www.thesun.co.uk/sport/3867124/wwe-plane-ride-from-hell-boozy-flight-from-the-uk-ended-up-with-multiple-sackings-two-law-suits-and-claims-of-sexual-harassment/> (last visited Oct. 21, 2024).

things.”

120. Former female wrestler Patricia Stratigeas (“Trish Stratus”) said during her interview, “The Attitude Era [of WWE] women weren’t really considered wrestlers. Eye candy, that’s kind of what they were at the time.”

121. Dave Meltzer added during his interview: “It was exploitive of women like you wouldn’t believe, but that’s what was selling and the audience was guys—teenage guys seeing women like that.”

122. In 2022, the Wall Street Journal reported that the WWE board had been alerted to a hush-money payment by Vince McMahon to cover up an alleged affair, and additional similar payments totaling millions of dollars were later discovered.⁵⁸ The allegations in those matters include the following.⁵⁹

- Paying \$7.5 million to a former wrestler who claimed that McMahon coerced her into giving him oral sex, demoted her, and then decided not to renew her contract in 2005 after she resisted further sexual encounters with him, per the Journal report. The wrestler and her lawyer reportedly negotiated a non-disclosure agreement with McMahon in 2018;
- Sending unsolicited naked photos of himself to a WWE contractor and sexually harassing her on the job, leading to about a \$1 million non-disclosure settlement in 2008; and
- In 2006, paying a former WWE manager \$1 million to stay silent about McMahon initiating a sexual relationship with her.

⁵⁸ *The Wall Street Journal*, “WWE’s Vince McMahon Agreed to Pay \$12 Million in Hush Money to Four Women”, <https://www.wsj.com/articles/wwes-vince-mcmahon-agreed-to-pay-12-million-in-hush-money-to-four-women-11657289742> (last visited Oct. 21, 2024); *The New York Times – The Athletic*, “Explaining Vince McMahon and the lawsuit against him as WrestleMania approaches”, <https://www.nytimes.com/athletic/5383504/2024/04/02/vince-mcmahon-lawsuit-wrestlemania-wwe-absence-explainer/> (last visited Oct. 21, 2024).

⁵⁹ *ESPN*, “Report: WWE’s Vince McMahon paid total of \$12M to 4 women to quiet sexual misconduct allegations”, https://www.espn.com/wwe/story/_/id/34212870/report-wwe-vince-mcmahon-paid-total-12m-4-women-quiet-sexual-misconduct-allegations (last visited Oct. 10, 2024).

123. Two weeks after the first Wall Street Journal report, New York Magazine ran a story containing interviews with former WWE female referee, Rita Chatterton, and former WWE wrestler, Leonard “Mario Mancini” Inzitari, claiming McMahon sexually assaulted Chatterton in a limousine in 1986. Chatterton had previously made those claims in 1992, but this was the first time they were corroborated by a second source. McMahon reportedly settled Chatterton’s allegation for a multimillion-dollar figure.⁶⁰

124. Mario Mancini, like everyone else involved in the WWE, obeyed the whims of McMahon. But now, as he puts it, Vince has “dug himself such a deep hole that I’m just tired of it. I can’t do it anymore.” Mancini had “heard a lot of different stories” about McMahon’s sexual proclivities. “He was strange, brother.” Mancini remembers Chatterton coming to him after McMahon had spoken with her. “I’m gonna be on the cover of Women’s Day and Better Homes and Gardens and Time magazine,” Chatterton said. “Who’s telling you that?” Mancini replied. She said it was McMahon. Mancini suspected something might go awry: “I go, ‘Oh, Rita, please—if you do anything with him, you’re gonna be gone.’” **“I told her, ‘Stay. Away. From. Vince.’”** (emphasis added).⁶¹

125. Additional allegations of sexual misconduct against Vince McMahon include: a tanning booth attendant who claimed in a police report in 2006 that McMahon showed her nude

⁶⁰ *New York Magazine – Intelligencer*, “She Was WWE’s First Female Referee. She Says Vince McMahon Raped Her. Rita Chatterton does not want to be forgotten”, <https://nymag.com/intelligencer/2022/06/vince-mcmahon-accused-of-rape-by-first-female-wwe-referee.html> (last visited Oct. 21, 2024); *Fox Sports*, “WWE boss Vince McMahon settles with female ex-referee Rita Chatterton over rape allegation”, <https://www.foxsports.com.au/wwe/wwe-news-2023-vince-mcmahon-settles-with-female-referee-rita-chatterton-over-rape-allegation-in-1986-settlement-amount/news-story/c2e0aa05fb89d613691c29231fdaab66> (last visited Oct. 21, 2024).

⁶¹ *New York Magazine – Intelligencer*, “She Was WWE’s First Female Referee. She Says Vince McMahon Raped Her. Rita Chatterton does not want to be forgotten”, <https://nymag.com/intelligencer/2022/06/vince-mcmahon-accused-of-rape-by-first-female-wwe-referee.html> (last visited Oct. 21, 2024).

pictures of himself and groped her; a spa manager who claimed that McMahon sexually assaulted her in 2011;⁶² and claims against McMahon of sexually harassment of the divas of the WWE, including former wrestler Ashley Massaro.⁶³

126. During his interview for the “*Mr. McMahon*” docuseries, Mr. McMahon acknowledged, and did not deny, his prior admission in 2001 to having had marital affairs at different times. He also bizarrely described how he has computers in his head and sometimes they work against him. For example, he said one computer was talking to the Netflix interviewer while the other was thinking something completely different. When asked what it was thinking, Mr. McMahon said, “Something having a lot of fun and it’s involving sex.”

127. As noted above, in January 2024, Janel Grant filed a lawsuit against McMahon, former WWE executive John Laurinaitis, and the WWE, alleging abuse, sex trafficking and more. Grant claims McMahon offered her a WWE job, which she alleges quickly became dependent on a sexual relationship with him, and Grant says she felt trapped for fear of repercussions. In the relationship, which lasted from 2019 to January 2022, McMahon put her through sexual acts of “extreme cruelty and degradation,” including injury, the complaint details. The suit claims McMahon later involved others in their sexual acts—including Laurinaitis—and that McMahon shared photos, videos and details with other WWE employees. It also claims McMahon used Grant

⁶² *Complex*, “A Full Break Down of Vince McMahon’s Sexual Abuse Allegations”, <https://www.complex.com/pop-culture/a/kevin-wong/vince-mcmahon-sexual-assault-allegations-explained> (last visited Oct. 21, 2024); “Boca Raton Police Dept. Incident/Investigation Report No. 2006-001732” <https://www.documentcloud.org/documents/23453452-vince-mcmahon-tanzabar-tanning-salon-police-report-ocr-redacted> (last visited Oct. 21, 2024).

⁶³ *Yahoo! Entertainment - Wrestle Zone*, “Ashley Massaro Accused Vince McMahon Of Sexually Preying On Talent In Previously Unreleased Statement”, <https://www.yahoo.com/entertainment/ashley-massar-accused-vince-mcmahon-155104632.html> (last visited Oct. 21, 2024).

as an incentive for an unnamed WWE wrestler to re-sign with the company.⁶⁴

128. The lawsuit additionally claims that McMahon pressured Grant to sign a nondisclosure agreement in early 2022 and leave the company. She ultimately signed an NDA for \$3 million and received a \$1 million payment in February 2022 but claims in the lawsuit that she did not receive the remaining balance. The lawsuit also claims the original anonymous tip to the WWE board about the payments was about this relationship with Grant.

129. After Grant's allegations became public, Mr. McMahon cancelled the remaining scheduled interviews for the docuseries. Mr. McMahon also later tried to buy the Netflix docuseries to prevent its release to the public.⁶⁵

130. Following the filing of Grant's complaint, the U.S. Attorney for the Southern District of New York announced a federal investigation concerning her allegations.⁶⁶

131. Following the filing of the lawsuit, TKO Group said the matter predated its ownership and that McMahon had no day-to-day control over the company since the sale and merger. TKO Group also said via a spokesperson that it took the "horrific allegations very seriously."⁶⁷

⁶⁴ *The New York Times – The Athletic*, "Explaining Vince McMahon and the lawsuit against him as WrestleMania approaches", <https://www.nytimes.com/athletic/5383504/2024/04/02/vince-mcmahon-lawsuit-wrestlemania-wwe-absence-explainer/> (last visited Oct. 21, 2024).

⁶⁵ *Bleacher Report*, "WWE Rumors: Vince McMahon Tried to Buy Netflix Doc to Prevent Release", <https://bleacherreport.com/articles/10136587-wwe-rumors-vince-mcmahon-tried-to-buy-netflix-doc-to-prevent-release> (last visited Oct. 21, 2024).

⁶⁶ *Deadline*, "Vince McMahon & WWE Officially Under DOJ Investigation; Rape & Sex Trafficking Case Paused, For Now", <https://deadline.com/2024/05/wwe-vince-mcmahon-federal-investigation-1235944884/> (last visited Oct. 21, 2024).

⁶⁷ *See also Variety*, "WWE Founder Vince McMahon Accused of Sexual Abuse and Trafficking in Lawsuit by Former Employee", <https://variety.com/2024/biz/news/wwe-vince-mcmahon-sued-sexual-abuse-trafficking-1235887844/> (last visited Oct. 21, 2024).

132. As detailed in Defendant TKO’s 2023 Annual Report,⁶⁸ on June 17, 2022, WWE and its then Board of Directors announced the formation of a special committee to investigate allegations of misconduct by Mr. McMahon. WWE later announced that it had determined that certain payments that Mr. McMahon agreed to make from 2006 to 2022, totaling over \$14.6 million, were not appropriately recorded as expenses in WWE’s consolidated financial statements.⁶⁹ All such unrecorded expenses have been or will be paid by Mr. McMahon *personally*.

133. Defendant TKO acknowledges in its 2023 Annual Report that, although the special committee investigation was completed and in January 2024, Mr. McMahon resigned from his position, WWE has received claims and complaints, and it may receive in the future additional claims and complaints, including the January 2024 complaint filed by Janel Grant that alleges trafficking and sexual assault. TKO acknowledges that the costs resulting from the special committee’s investigation and other ongoing and/or potentially new claims have been and will continue to be significant, and TKO *expects Mr. McMahon to reimburse the company* for reasonable expenses—during the year ended December 31, 2023, Mr. McMahon reimbursed TKO \$5.8 million.⁷⁰

134. WWE’s culture of tolerating and fostering sexual misconduct—based on the myriad allegations and lawsuits against WWE executives, Garvin and Patterson, Phillips, and Vince McMahon—demonstrates that the leaders of company knew or should have known about sexual abuse permeating the organization due to their own participation in such behavior.

⁶⁸ “TKO 2023 Annual Report”, https://investor.tkogrp.com/files/doc_financials/2023/ar/TKO-Annual-Report-2023.pdf (last visited Oct. 21, 2024).

⁶⁹ In a 2001 interview, Vince McMahon admitted to his wife Linda McMahon and the world that he had cheated with multiple women, including WWE stars.

⁷⁰ “TKO 2023 Annual Report”, https://investor.tkogrp.com/files/doc_financials/2023/ar/TKO-Annual-Report-2023.pdf (last visited Oct. 21, 2024).

135. Such a culture allowed Phillips to prey on Plaintiffs and other victims, even though it was commonly known throughout the organization that he had an unnatural interest in underaged boys, including a sexual foot fetish, and was consistently seen with Ring Boys at wrestling shows and outside of them including at least as far back as 1982 or 1983.

136. WWE, its executives, and the McMahons knew or should have known about Phillips's abuse of the Ring Boys, but they failed to prevent the abuse because many of them—particularly Garvin, Patterson, and Vince McMahon—were engaging in similar misconduct.

D. Vince McMahon Controlled the WWE Through Micromanaging and He Would Do Anything to Protect the Business, Even Lying and Cheating.

137. Vince McMahon knew or should have known about Phillips's abuse of the Ring Boys because Vince McMahon controlled WWE—including ring announcers like Phillips—through micromanaging.

138. In a transcript of a March 3, 1992, phone call between an attorney investigating allegations of sexual advances by members of the WWE, Billy Graham said as follows regarding Vince McMahon's control and knowledge of the company:

-
A: SO, THE POINT I'M TRYING TO MAKE IS, THE MAN I BELIEVE... THE REASON I BELIEVE HE KNEW ABOUT ALL THE SEXUAL ACTIVITIES IS BECAUSE I BELIEVE HE HAS TENDANCIES HIMSELF, AND MEL PHILLIPS HAS BEEN WITH HIM FOR FIFTEEN YEARS, AND MEL PHILLIPS... AND NOTHING GOES ON IN THE WORLD WRESTLING FEDERATION WITHOUT THE FULL KNOWLEDGE AND CONSENT OF VINCE MCMAHON, NOTHING.

Q: DO YOU THINK THAT THERE'S ANY QUESTION IN YOUR MIND THAT THE UH... MCMAHON IS... BEING IN CHARGE OF WWF, AND THE PEOPLE THAT CONTROL THE WWF KNEW THAT THIS WAS GOING ON?

A: NO QUESTION. THEY... LIKE I SAID, VINCE MCMAHON KNOWS EVERYTHING THAT GOES ON IN THE WORLD WRESTLING FEDERATION. THERE IS NOTHING THAT HE DOES'NT KNOW THAT GOES ON. THERE IS NOTHING THAT GOES BY, THERE'S NOTHING THAT IS NOT CONDONED OR OKAYED OR SUPERVISED OR EVEN PARTICIPATED IN BY VINCE MCMAHON. HE... THERE'S NOTHING... NOTHING GOES BY HIM, NOTHING ESCAPES HIM. HE IS RESPONSIBLE FOR EVERY MECHANISM, EVERY ASPECT OF THE WWF. HE IS TOTALLY RESPONSIBLE THEM. HE EVEN BRAGS ABOUT THAT. THAT NOTHING ESCAPES HIM. HE IS A KNOW-ALL, HE IS A SEE-ALL, HE'S CONSIDERED... AS A MATTER OF FACT, SOME PEOPLE CALL HIM CEASAR. HE'S SUCH A RUDE DICTATOR. THAT WAS ONE OF HIS NICK-NAMES. AS A MATTER OF FACT, CHIEF J. STRONGBOW CAME UP WITH THAT NAME. HE CALLED HIM CEASAR, LITTLE CEASAR, BECAUSE HE WAS SUCH A RULER AND A DICTATOR, AND NOTHING WOULD ESCAPE HIM. SO, HE WAS FULLY AWARE OF EVERYTHING. IT WAS IMPOSSIBLE FOR HIM NOT TO BE.

139. Vince McMahon recently admitted to such a controlling approach, discussing his creative involvement moving forward after the WWE and UFC merger announcement: “Yes and no. On a higher level, yes. In the weeds, which, *I always loved to get in the weeds in the past*, no. Can't do that [moving forward].”⁷¹

140. *Rolling Stone* magazine recently reported that McMahon was closely involved in every single show script, which was unusual, and the writers essentially satisfied his whims and

⁷¹ CNBC, “WWE agrees to merge with UFC to create a new company run by Ari Emanuel and Vince McMahon”, <https://www.cnbc.com/2023/04/03/wwe-ufc-merger-endeavor.html> (last visited Oct. 21, 2024) (emphasis added).

transcribed for him. Multiple former employees described hostile conditions that permeated not just the writers' room but the company in general, whether at the corporate headquarters or when the organization's shows filmed on the road. Enough female writers complained about their treatment to WWE human resources in 2020 that leadership held a Zoom meeting they referred to as a "women's forum," but senior leadership allegedly later told them to stop acting like middle schoolers and to *not* go to human resources with future problems.⁷²

141. In 2016, *The Ringer* published a compilation of many of Vince McMahon's public statements, which included in pertinent part:

- The local guys were lazy. They weren't listening to the marketplace. We were so consumer-oriented. We never lifted our ears from the ground. We gave the public what it wanted. We broke the mold. [*Sports Illustrated*, 1991];
- My god. Some of the things I have said and have done. [Mr. McMahon is] the most reprehensible individual on the planet. . . . Uncaring, a powermonger, manipulative, very manipulative, always trying to get what I want and being very clever about it. Art imitating life and vice versa. It's fun because some of it's true, you know what I mean? [*New York Magazine*, 1998]
- If a cameraman is scampering and the cable puller's not keeping up, I'll pull the cable. There's no job too menial. [*Playboy*, 2001]⁷³

142. In an October 16, 1998, story in *New York* magazine called "Beyond Fake – Vince McMahon,"⁷⁴ journalist and *New York Times* best-selling author Nancy Jo Sales wrote, "The WWF does everything in-house, from its makeup lady to its satellite transmission; everything in the \$500-million-a-year company is controlled by Vince." When she visited Vince in WWE's

⁷² *Rolling Stone*, "Inside the WWE Writers Room, 'A Kingdom Ruled by Fear'", <https://www.rollingstone.com/culture/culture-features/wwe-vince-mcmahon-writers-room-workplace-misconduct-1235138010/> (last visited Oct. 21, 2024).

⁷³ *The Ringer*, "The Story of Vince McMahon", <https://www.theringer.com/2016/6/2/16040702/the-story-of-vince-mcmahon-958f3274f5ce> (last visited Oct. 21, 2024).

⁷⁴ *New York Magazine*, "Beyond Fake", <https://www.nancyjosales.com/wp-content/uploads/2015/05/Wrestling2.pdf> (last visited Oct. 10, 2024).

headquarters, there was a small tape recorder in the middle of the conference table to tape her – Vince said, “As much as you will learn about our business . . . *I’ll learn a lot, too; I always do. I’ll learn a lot about you.*” (emphasis added).⁷⁵ McMahon also said to her, “When you’re on that fast track, you just didn’t think about the other people who were being hurt.”

143. Nancy Jo Sales’s story also quoted the WWF magazine as saying, “Whether anybody likes it or not, I’m tellin’ you—HE’S [Vince] IN CONTROL OF THIS ENTIRE SITUATION!!!” “It’s a human chess game, and . . . before you know it . . . CHECKMATE!”

144. Forbes reported in 2015⁷⁶ that Vince McMahon has developed a reputation as an overly involved owner, “who, for better [or] worse, often finds himself prioritizing his own agenda over the good of his company.” Notably, McMahon reportedly micromanaged the WWE announcers by using a plethora of unusual rules governing what language they could or could not use, for example: not allowing the use of “hatred,” never using “the title is on the line,” and avoiding words like “feuds” and “pro wrestling.”

145. Vince McMahon also reportedly⁷⁷ had a direct line of communication with WWE commentators via their headsets, and “[t]his unique way of interfacing with the announcers had become legendary within the wrestling industry. McMahon used this direct communication channel to convey his specific expectations, directions, and even his displeasure during live shows. It was common for him to shout directives to the commentators, demanding they deliver lines, and anecdotes, or promote storylines according to his vision.” WWE commentators have described

⁷⁵ Later, the Post’s Phil Mushnick told her that he believed Vince hired detectives to shadow him after Mushnick began writing stories about the WWE. *Id.*

⁷⁶ *Forbes*, “Vince McMahon’s Micromanagement Hurting the WWE Brand”, <https://www.forbes.com/sites/blakeoestricheer/2015/07/08/vince-mcmahons-micromanagement-hurting-the-wwe-brand/> (last visited Oct. 21, 2024).

⁷⁷ *The Sportster*, “This Is Why So Many WWE Announcers Hated Their Job”, <https://www.thesportster.com/wwe-announcers-hated-job-vince-mcmahon/> (last visited Oct. 21, 2024).

such experiences.⁷⁸

146. On August 2, 2024, *The Ringer* published a story about WWE ring announcer Michael Cole, which detailed, in pertinent part, that WWE made him change his name and that Vince McMahon spoke to ring announcers through headsets as they called matches—telling announcers exactly how they should describe the match on-air.⁷⁹ Michael Cole stated that McMahon cursed him out on the headset and said inappropriate things to him many times.

147. As detailed above, on the 1992 *Phil Donahue Show*, former wrestler Barry Orton described Vince McMahon as “king of the empire” who has “eyes and ears everywhere.”

148. A CNN article⁸⁰ that discussed the history of allegations against WWE and Vince McMahon described him as a larger-than-life figure who, “[i]n his decades as CEO of the WWE, [] was known as such an intense micromanager that he barely slept, rarely took vacations and almost never stopped putting his own spin on every single aspect of the company’s output. Many longtime followers of the company simply assumed he’d die in the role rather than retire.” The article further said, “[He] was more akin to a king than a business executive in the world of WWE, his fingerprints on everything. He had molded the industry in his image, running most of his competition out of business and turning his company into *the* destination for pro wrestling. For most of two decades, he had a monopoly on the business.”

149. Multiple interviewees—including McMahon himself—in the Netflix docuseries

⁷⁸ *Id.*

⁷⁹ *The Ringer*, “How Michael Cole Got Over”, <https://www.theringer.com/wwe/2024/8/2/24211622/michael-cole-wwe-career-profile> (last visited Oct. 21, 2024).

⁸⁰ *CNN – Business*, “The WWE knew Vince McMahon was a liability. So why did it bring him back after his scandalous departure?”, <https://www.cnn.com/2024/01/29/media/vince-mcmahon-wwe-risk/index.html> (last visited Oct. 21, 2024).

“*Mr. McMahon*” described his control over everything in WWE and that he would do anything to protect it even if it meant lying or cheating:

- Dave Meltzer said, “Very few people were in control of a world; Vince McMahon was.”
- Bret Hart said, “I love Vince and I have a lot of respect for him, but he was a guy that often lied to me and let me down with his lies.”
- Tony Atlas said Mr. McMahon protected the business.
- Bruce Prichard said, “Vince is going to do whatever it takes to be successful on the business side.”
- Former wrestler The Undertaker said, “He [Vince] had to do what’s best for business, and that’s what he’s always going to do.”
- Former wrestler and current chief content officer and head of creative for WWE, Paul Levesque “Triple H”, said regarding a controversy known as “The Montreal Screwjob” that Mr. McMahon “was so adamant we had to absolutely swear that we knew nothing about this. He was like ‘I don’t care who asks you, you bald face lie right to them and say you knew nothing about this. This was a Vince McMahon call.’”
- Shane McMahon (Vince’s son) recounted wrestling Vince as a kid. After Vince pulled his hair, Shane said, “You totally cheated, you can’t do that.” Vince told him, “That’s what I do in life, I cheat and I win. Learn that lesson, sometimes you have to cheat.”
- Mr. McMahon said, “Life’s not fair sometimes. I don’t fight fair. And you know, this is business and there’s nothing I wouldn’t do for our business.”
- Mr. McMahon said, “I’m in business, and business comes first.”
- Mr. McMahon said, “I wish I could tell you the real stories, holy shit.”
- Mr. McMahon said, “What I say a lot of times is totally different than what I think,”

and “as a businessman you have to throw things out there and it’s not really [how] you feel, but it controls thought processes by doing that.”

- Mr. McMahon said regarding when he was younger, “In those days I could fight and loved to fight. If you could do that well, now you’re somebody. I was good at fighting, but they would say ‘you didn’t fight fair, you cheated.’ [But I would say] ‘yea, I won.’”

150. Vince McMahon’s decades-long micromanagement of his company—including over WWE ring announcers—and his admissions regarding his knowledge of and gathering information about people around him—supports the fact that he knew or should have known about Phillips’s abuse of the Ring Boys.

151. Mr. McMahon’s willingness to do anything to protect his business supports the fact that he would cheat and lie when facing controversies, including the Ring Boy Scandal.

152. Linda McMahon was in the thick of it, acting as Vince’s wife, confidante, co-leader in running the business, and the leader in trying to conceal the sordid underbelly of WWE’s sexual abuse culture.

153. In his interview for the “*Mr. McMahon*” docuseries, WWE’s Bruce Prichard described how when he joined the company in the 1980s, it was Vince as the boss and Linda as the second boss. Linda handled the business, and Vince handled the creative side and the company vision.

154. For example, regarding Tom Cole’s allegations against Phillips in 1992, Linda McMahon stated during an interview that an investigation into Mel Phillips “was taking so long and there was so much negativ[ity] happening with it, that we finally told Mel that it was better

for him and better for our company for him to go on in a different way.”⁸¹

155. When she ran for Senate, Linda McMahon attempted to sanitize wrestling and distance herself from the violence, sexual exploitation, and excesses of professional wrestling, but former employees allege she was in the heart of it all.

156. Superstar Billy Graham once said of Linda McMahon, “She may look like a Sunday school teacher. Linda McMahon’s hands are as bloody as her husband’s because she is aware of every move in the ring.”⁸²

E. Phillips’s Misconduct, Including His Foot Fetish, Was Sexual Abuse.

157. Foot fetishes are sexual in nature. Multiple psychologists have noted that one of the most common sexual fetishes is foot fetishism.⁸³ Several books on sexual fetishism have reported that the three most common body part fetishes are feet, hands, and hair. Individuals who derive sexual pleasure and arousal from feet can be described as having podophilia. Foot fetishism has received a fair amount of empirical attention compared to other types of sexually fetishistic behavior because foot fetishes are more prevalent than most other types.

158. Researchers, including Sigmund Freud, have proposed several explanations for how and why people develop foot fetishes, such as: perceiving feet or toes as a phallic substitute, the part of the brain that processes sensation people get from feet is next to the area that perceives genital stimulation, and linking a typically non-erotic object or body part to arousal through

⁸¹ *YouTube*, “Local interview with Tom Cole Protest Outside WWF”, <https://www.youtube.com/watch?v=zCq8t5rDhVQ&t=68s> (last visited Oct. 21, 2024).

⁸² *The Hill*, “Linda McMahon’s rise puts wrestling’s dangerous history in the spotlight”, <https://thehill.com/homenews/campaign/56308-linda-mcmahons-rise-puts-wrestlings-dangerous-history-in-the-spotlight/> (last visited Oct. 21, 2024).

⁸³ *Psychology Today*, “In Feet First”, <https://www.psychologytoday.com/us/blog/in-excess/201405/in-feet-first>; (last visited Oct. 21, 2024); see also *Healthline*, “What is Partialism?”, <https://www.healthline.com/health/partialism> (last visited Oct. 21, 2024).

positive feedback/reward.⁸⁴

159. Researchers who psychoanalyze human behavior theorize that fetishes happen from events during a person's childhood, fixation on a certain object during childhood, and/or regressing by becoming aroused by objects or body parts that remind them of their childhood.⁸⁵

160. Phillips was a pedophile with podophilia.

161. Multiple reports exist of other pedophiles having a foot fetish/podophilia.

- A gymnastics coach was jailed for sexually abusing children by licking their feet.⁸⁶
- A man was convicted and sentenced to 40 years after sexually exploiting minors by, among other things, licking and sucking feet, simulating intercourse, and producing videos of the same.⁸⁷
- According to a police report, a man with a foot fetish forced a victim to perform sexual acts on him using her feet, and he had been arrested a month prior for trying to lure a child from a school.⁸⁸
- A man was convicted of second-degree criminal sexual conduct for putting a minor's feet in his groin area and took pictures of the boy's feet, and the man had been convicted

⁸⁴ *Medical News Today*, "What causes a foot fetish?", <https://www.medicalnewstoday.com/articles/what-is-a-foot-fetish#the-science-of-it> (last visited Oct. 21, 2024).

⁸⁵ *Id.*

⁸⁶ *Metro*, "Gymnastics coach jailed for sexually abusing children by licking their feet", <https://metro.co.uk/2016/09/30/gymnastics-coach-jailed-for-sexually-abusing-children-by-licking-their-feet-6163491/> (last visited Oct. 21, 2024).

⁸⁷ *U.S. Attorney's Office, Southern District of Texas, Press Release*: "Friendswood man gets 40 years after sexually exploiting child", <https://www.justice.gov/usao-sdtx/pr/friendswood-man-gets-40-years-after-sexually-exploiting-child> (last visited Oct. 21, 2024).

⁸⁸ *NBC News Local, Las Vegas*, "UNLV sexual assault suspect had foot fetish; linked to other crimes", <https://news3lv.com/news/local/unlv-sexual-assault-suspect-had-foot-fetish-linked-to-other-crimes> (last visited Oct. 21, 2024).

before of similar conduct involving minors' feet.⁸⁹

III. Phillips Sexually Abused the Plaintiffs and Caused Lasting Injuries.

A. John Doe 1

162. John Doe 1 was 13 years old when he met Phillips in approximately 1981–1982 outside a venue hosting a WWE event. John Doe 1 and his cousins were near the area where the wrestlers would enter the arena. Phillips came up to John Doe 1, asked him his name, and asked whether he'd like to come in the arena, saying, "I can get you in. I work here." Phillips then asked John Doe 1 his age, and he told Phillips he was 13.

163. Inside the arena, Phillips took John Doe 1 to a private room, began hugging him, and then touched John Doe 1's genital area. Phillips pretended it was a mistake.

164. When it was time for the show, Phillips had a front row seat for John Doe 1. At the end of the night, Phillips asked John Doe 1 for his phone number and said he wanted it so that John Doe 1 could go to the show with him again. John Doe 1 told Phillips he would have to speak with his mom.

165. A couple weeks later, Phillips called his mom, explained how they met, asked if he could come pick up John Doe 1, and told his mom he would be safe. Phillips took John Doe 1 to the Springfield Civic Center (n/k/a MassMutual Center) in Massachusetts, went to eat, and drove around. Phillips then asked John Doe 1 if he wanted to see his hotel room so they could talk about wrestling.

166. Phillips then took off all his clothes except underwear and told John Doe 1 to take his shirt off. Phillips began suffocating John Doe 1 and when he protested, Phillips said, something

⁸⁹ *M Live*, "9 year-old victim of Hudsonville 'foot fetish' suspect speaks out at sentencing", https://www.mlive.com/news/grand-rapids/2013/02/9-year-old_victim_of_hudsonvil.html (last visited Oct. 21, 2024).

along the lines of, “You’re fine, I’m just doing wrestling moves.” Phillips then began massaging John Doe 1’s legs, told him to take off his socks, and massaged and licked John Doe 1’s feet.

167. John Doe 1 was shaking, scared, and tried to get dressed, but Phillips would not let him. Phillips did more wrestling moves, told John Doe 1 that he needed to stay, and that they would get ice cream. Later, they went to a restaurant to eat. Phillips then took John Doe 1 home and handed him approximately \$80.

168. The next time WWE came to the Springfield Civic Center, Phillips called John Doe 1 and invited him to the event. John Doe 1 asked if he could bring his cousins, but Phillips said no. Phillips met John Doe 1 outside the arena and hugged him. Phillips then took him and two other young boys inside and introduced them to several wrestlers. Phillips took the three boys around the arena, including the ring area, before taking them to a private room with a bathroom. Phillips took the boys in the bathroom and began hugging them and touching their legs, genitals, and buttocks. Phillips started grinding his genitals on the boys; John Doe 1 could feel that Phillips was aroused. Phillips then gave the boys front row seats next to the announcer’s table where Phillips worked.

169. John Doe 1 also attended a WWE event with Phillips at the Spectrum in Philadelphia. Phillips picked up John Doe 1 outside the Springfield Civic Center and drove to Philadelphia, along with another boy from Boston who was close to John Doe 1’s age. John Doe 1 sat in the front of the car. Phillips was continually touching his leg. At the arena, Phillips took John Doe 1 to a private room where he cornered him, grabbed his genitals, and would not let go. Phillips also bent John Doe 1 over, grinding his genitals on John Doe 1, simulating penetration while saying, “Everything is alright, just listen to me, look where we are.”

170. Later, in the arena, a wrestler asked John Doe 1 if he was ok. John Doe 1, scared of

Phillips, stuttered, “Yeah.” The wrestler asked again. Phillips overheard and told the wrestler that John Doe 1 was his friend, so the wrestler said “Ok, Mel.” After the show, John Doe 1 wanted to go home, but Phillips said they were spending the night. They got on a bus with other WWE workers and the other boy from Boston and went to a hotel. In the room, Phillips took off all his clothes except underwear, made the two boys get naked, and got on top of them. Phillips was aroused and ejaculated on John Doe 1’s stomach—Phillips told him to go in the bathroom to clean it up, but John Doe 1 did not know what Phillips meant. Phillips then told him: “The stuff on your stomach.” The other boy was crying.

171. When John Doe 1 returned to the room, Phillips wrestled the boys more, including grabbing them by the hair, picking them up, and throwing them around—all while still naked. John Doe 1 was terrified. Later, the boys tried to go to sleep, but Phillips continued to touch John Doe 1 by massaging his body including his genitals, buttocks, and feet. Phillips painfully manipulated John Doe 1’s feet, and when he said it was painful Phillips then licked them for a long time. The other boy appeared shellshocked, frozen in a chair. The next morning Phillips dropped off John Doe 1 at the Springfield Civic Center, gave him over \$150, and said, “Don’t say anything to your parents.” The boy from Boston was still in the car.

172. Phillips called John Doe 1 regularly. Weeks later, Phillips asked to pick him up at the Springfield Civic Center. John Doe 1 went because he wanted to get out of his house where his home life was stressful. Phillips took him to a restaurant to eat and then drove around. Phillips tried to kiss John Doe 1, told him how good he looked, and said he could help John Doe 1 become a wrestler. Phillips asked if John Doe 1 told his parents anything about the prior trip, and John Doe 1 said he only told them that Phillips took him to cool wrestling events. Phillips then took him to a hotel room where he touched John Doe 1’s genitals, forced John Doe 1 to touch Phillips’s own

genitals with his mouth and hands, and tried to penetrate John Doe 1. Phillips ejaculated. Phillips later drove John Doe 1 back to the Springfield Civic Center, gave him over \$200, and told him again not to tell his parents.

173. Phillips continued to call John Doe 1 and invited him on a trip to Maryland. Phillips picked him up in a van and they drove to Baltimore. Phillips tried holding John Doe 1's hand and kept telling him how handsome he was, that he was a good kid, and that he could make him a famous wrestler. At the arena, some of the wrestlers recognized John Doe 1, said hi; a few of the wrestlers asked John Doe 1 if he was okay.

174. After the show, Phillips took John Doe 1 and three other boys to a hotel where they met other wrestlers. Later, in Phillips's room, Phillips stripped down to his underwear, told the boys to also do it, and then wrestled them. Then, Phillips got naked, took the boys' underwear off, and stroked their genitals. Two boys were crying. Phillips then laid the boys down with their backs to him, saying it was a game. He then tried to penetrate the boys. John Doe 1 tried to resist by squirming. Phillips was very aggressive with all four boys, tried to get the boys to touch his own genitals, and ejaculated multiple times. When John Doe 1 was upset, Phillips said, "We're having fun." Phillips grinded his genitals on John Doe 1 throughout the night in the bed, and when John Doe 1 would try to put his underwear back on Phillips got angry and forced him to stay naked. The next day, Phillips drove John Doe 1 home.

175. Thereafter, Phillips continued to call John Doe 1, but he was now very afraid of Phillips and told him he did not want to see him again.

176. In total, Phillips sexually abused John Doe 1 approximately seven or eight times in a 12–18-month period.

177. Phillips also gave John Doe 1 alcohol multiple times.

178. Since Phillips's sexual abuse of him as a minor, John Doe 1 has suffered from mental and emotional distress.

B. John Doe 2

179. In 1984, when he was 13, John Doe 2 met Phillips outside an arena hosting a WWE event. After talking about wrestling, Phillips said he wanted a favor and to follow him to the dressing room. Once there, Phillips threw him to the ground, got on top of him, took off his shoes, and began pulling and twisting his feet and toes in a painful way. Phillips also put John Doe 2's feet near Phillips's genitals; Phillips appeared to be sexually aroused. Phillips also pressed his hands against the buttocks and groin area of John Doe 2.

180. Phillips did the same things at other wrestling events, including at the Providence Center in Rhode Island where Phillips had his own dressing room. Phillips would also set up a video camera in hotel rooms to record what he was doing, frequently wearing only a t-shirt and underwear. Phillips was very aggressive behind closed doors. He would often "wrestle" and fondle John Doe 2 on the feet, buttocks, and crotch for 30 minutes or more. Phillips would clench John Doe 2's penis between Phillips's hands. Phillips likely orgasmed during these incidents.

181. Phillips would often wrestle him to the ground, grasp his two hands together with his arms/forearm on the groin area, and pin him to the ground using his full weight. John Doe 2 would try to squirm away, but Phillips had him pinned so that he was helpless and could barely move. But Phillips would be able to grab and fondle his feet and body, including touching his buttocks, between the legs, and in the groin. Part of the cycle of abuse is shown in this actual photo taken of Phillips and John Doe 2, which shows John Doe 2 pinned down while Phillips is on top of him with one of John Doe 2's feet bent backwards and pinned near Phillips's face:



182. John Doe 2 witnessed Phillips similarly abuse other young boys.

183. Phillips often traveled in his own vehicle with the boys while following the WWE ring crew. They would eat together at restaurants and stay with Phillips at hotels. It was common knowledge within the WWE that Phillips was traveling around with young boys and that he had a young boy foot fetish. When backstage at wrestling shows, the boys were sometimes asked by wrestlers and security who they were, and they just had to say, "I'm with Mel Phillips." WWE wrestlers, security, and other employees often saw the boys helping set up the ring and coming to and leaving the shows with Phillips.

184. Phillips psychologically manipulated John Doe 2 in an effort to control and dominate him.

185. John Doe 2 attended numerous wrestling shows with Mel Phillips from approximately 1984–1989, in at least the following states: Maryland (Baltimore), Pennsylvania, Rhode Island, Massachusetts, Connecticut, and New York. John Doe 2 was sexually abused by

Phillips in all those states multiple times and was transported across state lines.

186. After being transported across state lines, Phillips took photos and/or video of the abuse that he inflicted upon John Doe 2.

187. Since Phillips's sexual abuse of him as a minor, he has suffered from mental and emotional distress.

C. John Doe 3

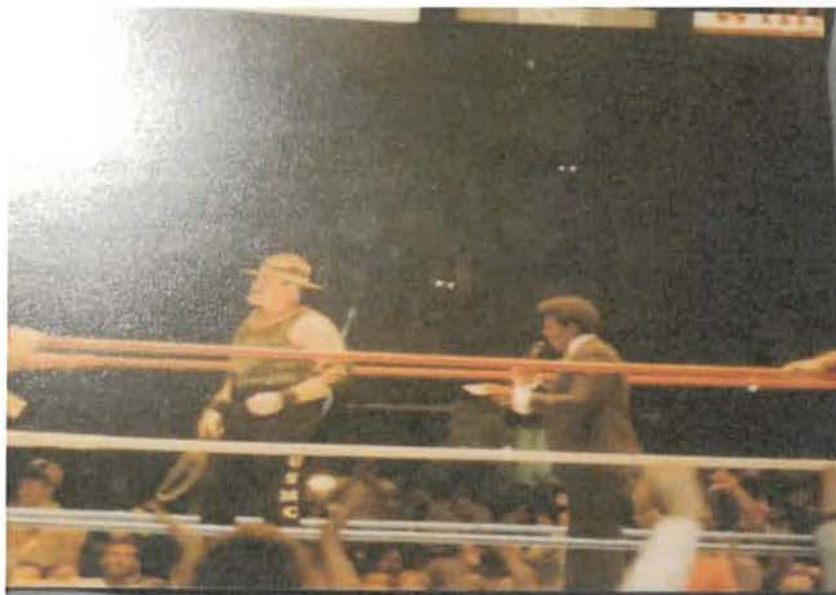
188. John Doe 3 met Phillips in the mid-1980s when he was approximately 14 years old. When they met, Mel explained who he was, asked if he liked wrestling, helped him meet a couple wrestlers, and offered to take him to Philadelphia for a show at the Spectrum.

189. Phillips would, at times, pick him up and drive him to Hamburg, Pennsylvania where WWE did tapings—they were always alone except one time when there was another boy with them.

190. He traveled with Phillips to a show in Philadelphia, where they stayed at a hotel. After the show at the Spectrum, they went to dinner, and then returned to the hotel. Once back in the room, Phillips wrestled him to the ground and started squeezing and twisting his feet to make him submit. While wearing nothing but a small T-shirt and underwear, Phillips then got rougher by pinning him on his back with his legs underneath Phillips with Phillips back facing him—Phillips then rubbed his genitals on John Doe 3's legs and feet until he orgasmed. They then went to sleep in the same bed, and he woke up in the middle of the night with Phillips's crotch up against his backside. Phillips kept saying, "It's ok, it's ok," and it felt like he ejaculated on him. In the morning, Phillips drove him home and gave him money for helping put together the ring at the show.

191. Phillips sexually abused him in similar ways at most, if not all, of the subsequent

wrestling shows he attended with Phillips. The following are photos taken by John Doe 3 of Mel Phillips during one such show,⁹⁰ which highlights the closeness to the ring and Phillips that the Ring Boys like John Doe 3 often found themselves:



192. After a few months of attending wrestling shows with Phillips, a wrestler

⁹⁰ Also pictured is Sgt. Slaughter, who wrestled with the WWE in the 1980s, 1990s, 2000s, and has continued to make WWE appearances in recent years.

approached John Doe 3 and said to be careful around Phillips.

193. When traveling in hotels with John Doe 3, as soon as the door shut, Phillips would get on John Doe 3, put him in wrestling holds to submit, pull his feet and twist his toes, and satisfy himself sexually. There were times when Phillips touched John Doe 3's genitals.

194. Phillips sometimes gave John Doe 3 "soda" in cups that tasted different than normal soda, and when John Doe 3 asked Phillips about it, Phillips just said, "It's ok." John Doe 3 felt light-headed after drinking the "soda" and shortly thereafter Phillips would begin abusing him as described.

195. John Doe 3 attended at least one dozen wrestling shows with Phillips from around 1984–1987, in at least the following states: Maryland (Baltimore), Pennsylvania, and other states.

196. John Doe 3 was transported by Phillips across state lines. After being transported across state lines, John Doe 3 was subjected to the abuse described herein, along with Phillips taking photos and/or video of the abuse.

197. Since Phillips's sexual abuse of him as a minor, he has suffered from mental and emotional distress.

D. John Doe 4

198. John Doe 4 was around 13 years old when he met Mel Phillips in approximately 1983–84.

199. John Doe 4 met Phillips, along with neighborhood friends who were also minors. Phillips frequently drove to the street where they all lived, picked them up, and drove them around Philadelphia.

200. Confidential Witness #1 is a sibling of one of John Doe 4's friends. Confidential Witness #1 saw Phillips multiple times drive onto their street, watch the boys play, and show them

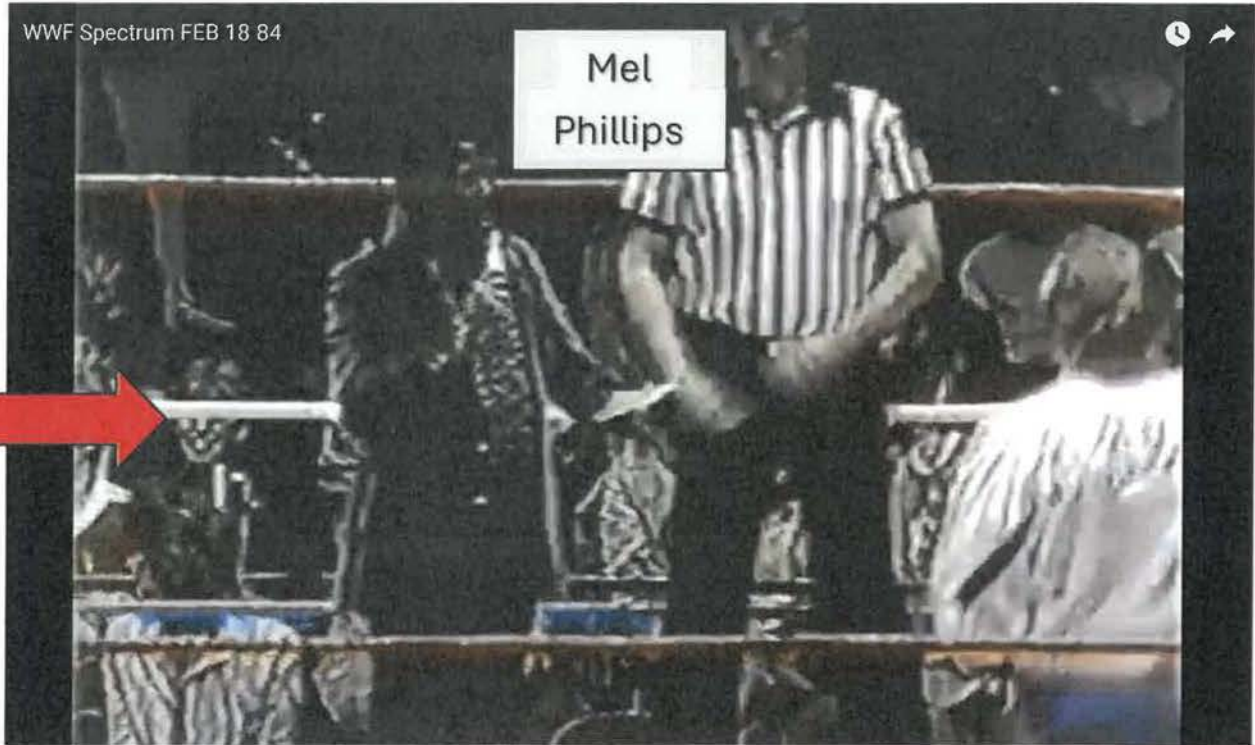
all WWE championship belts that he kept in his car. Phillips then drove the boys away, and they sometimes returned drunk. Other times, Confidential Witness #1 knew that the boys stayed overnight in hotels with Phillips.

201. Phillips took John Doe 4 to a WWE Event at the Capital Centre in Landover, Maryland. After the event, Phillips plied John Doe 4 and other boys with alcohol and took them to a local motel. John Doe 4 vomited, so Phillips took John Doe 4 into the bathroom and got in the shower with him. Phillips touched John Doe 4's buttocks and genitals and put John Doe 4's hand on Phillips's penis. Phillips held John Doe 4's arm behind his back and used his hand to stroke Phillips's penis until he ejaculated. Phillips also tried penetrating John Doe 4.

202. Phillips also took John Doe 4 and his friends to several WWE shows at the Spectrum. John Doe 4 and his friends worked for Phillips on the ring crew at those events. Several times when the boys arrived at the Spectrum, they simply told security they were meeting Phillips and security let them in. Below is a screenshot of John Doe 4 (red arrow) seated in the second row, who attended the show with Phillips (also pictured below), along with other ring boys:

WWF Spectrum FEB 18 84

Mel
Phillips



203. At each WWE show at the Spectrum, Phillips “wrestled” John Doe 4 and the other underaged boys, including performing submissions on them such as pinning them on the ground, laying on top of their backsides with his groin in their buttocks, bending their limbs, and twisting and pulling their toes. Phillips jammed his foot into John Doe 4’s inner thigh until it hurt. Phillips also took John Doe 4’s foot and put it on Phillips’s genitals and vice versa.

204. Phillips often did these things to John Doe 4 and his neighborhood friends in the locker room in full view of wrestlers⁹¹ and Pat Patterson. Everyone joked, “Oh, Mel’s getting your toes.”

205. Patterson was frequently around the ring crew, and at least once paid John Doe 4 to run an errand for him. Vince McMahon also checked on the ring when John Doe 4 and other ring boys were working on it.

⁹¹ Including the Wild Samoans, a tag-team duo who wrestled in the WWE in 1979–80 and 1982–85.

206. At one WWE event, Joey Marella, a former WWE referee (and son of former wrestler and announcer Gorilla Monsoon), told John Doe 4 and his underaged friends, “Watch out what you’re doing with these people,” referring to Phillips and others in charge of the ring crew.

207. Phillips drove John Doe 4 and other Ring Boys to WWE events in Pennsylvania multiple times, bought him food, and took him to hotels.

208. In hotels, Phillips often wore only underwear and forcefully “wrestled” John Doe 4 and other underaged boys who were also not fully clothed.

209. Phillips also drove John Doe 4 and his underaged friends to WWE events at the Nassau Coliseum in New York and at Madison Square Garden. At a hotel, Phillips gave the underaged boys beer, they became intoxicated, and John Doe 4 passed out. The next day, John Doe 4 noticed blood in his underwear and experienced fecal incontinence, which had not happened to him before.

210. Confidential Witness #1’s brother (one of the friends of John Doe 4) told their other sibling that Phillips put things in his rectum. He also said that Phillips—while in his underwear—would pin the boys down, lay or sit on top of them, and spread their toes apart. Around that time, he also said to Confidential Witness #1, “It wasn’t my fault.”

211. John Doe 4 was transported by Phillips across state lines. After being transported across state lines, John Doe 4 was subjected to the harassment and abuse described herein.

212. Since Phillips’s sexual harassment and abuse of him as a minor, John Doe 4 has suffered from mental and emotional distress.

E. John Doe 5

213. John Doe 5 was around 15 years old when he met Mel Phillips in approximately 1983–84.

214. John Doe 5 met Phillips, along with neighborhood friends who were also minors. Phillips frequently drove to the street where they all lived, picked them up, and drove them around Philadelphia.

215. John Doe 5 is the Ring Boy in the photo, *supra*, holding the tag team championship belt in Phillips's car. The following are two additional photos of John Doe 5 working as a Ring Boy. In the first, John Doe 5 is backstage with a person working security and Ken Patera, a former wrestler with WWE during several time periods including 1984-85. In the second photo, John Doe 5 is next to former WWE wrestler Tony Atlas.





216. Phillips also took John Doe 5 and his neighborhood friends to WWE shows at Nassau Coliseum in New York and at the Spectrum in Philadelphia. John Doe 5 and his friends worked for Phillips on the ring crew at those events.

217. Phillips also took John Doe 5 to a WWE Event at the Capital Centre in Landover, Maryland. After the event, Phillips plied John Doe 5 and other boys with alcohol Phillips kept in his car, got them drunk, and took them to a local motel. One of John Doe 5's friends vomited from the alcohol.

218. At the hotel, Phillips "wrestled" John Doe 5 and the other underaged boys, including performing submissions on them such as pinning them on the ground, laying on top of their backsides with his groin in their buttocks, bending their limbs, and twisting and pulling their toes. Phillips also used his hands to rub John Doe 5's legs, calves, and thighs. Phillips also took John Doe 5's foot and put it on Phillips's genitals. Phillips was aroused.

219. In hotels, Phillips often wore only underwear and forcefully "wrestled" John Doe 5 and other underaged boys who were also not fully clothed.

220. John Doe 5 took the following photo of two of his neighborhood friends in a hotel room where they stayed with Phillips, with what appears to be a beer can to the left of the Coke can:



221. John Doe 5 was transported by Phillips across state lines. After being transported across state lines, John Doe 5 was subjected to the harassment and abuse described herein.

222. Since Phillips's sexual harassment and abuse of him as a minor, John Doe 5 has suffered from mental and emotional distress.

IV. Parties

A. Plaintiffs

223. John Doe No. 1 is a citizen of Massachusetts.

224. John Doe No. 2 is a citizen of Massachusetts.

225. John Doe No. 3 is a citizen of Pennsylvania.

226. John Doe No. 4 is a citizen of Florida.

227. John Doe No. 5 is a citizen of Pennsylvania.

228. Plaintiffs are using pseudonyms because of the highly personal nature of their victimization and because of the serious risk of harm to which they would be exposed if they brought this suit in their actual names.

229. Defendants have tremendous wealth and power and have used it to retaliate against others who have attempted to come forward.

230. Plaintiffs' safety, right to privacy, and personal security outweigh the public interest in their identification.

231. Defendants use their power, wealth, and influence to control those around them.

232. It is in the public's interest to give anonymity to sexual abuse survivors, so that other victims may come forward and not be fearful that their identities will be publicized.

233. Plaintiffs' legitimate concerns for privacy outweigh any prejudice to Defendants or the public by allowing John Does 1–5 to proceed anonymously.

B. Defendants

234. Defendant VINCENT K. MCMAHON, a Connecticut citizen, co-founded WWE in 1980 and served on the board of directors of WWE from 1980 to September 2023. He was the Executive Chairman of the Board for Defendant TKO Group Holdings, Inc. until January 2024 when he resigned after allegations of sex trafficking and sexual assault. Since then, he has been selling hundreds of millions of dollars' worth of TKO stock.⁹² This Complaint encompasses

⁹² *Variety*, "Vince McMahon, After Quitting TKO Board, Is Selling \$311 Million in Stock Back to WWE's Parent Company and Endeavor", <https://variety.com/2024/tv/news/vince-mcmahon-tko-stock-sale-endeavor-1235963815/> (last visited Oct. 21, 2024); *Bleacher Report*, "Vince McMahon Sells Final TKO Shares for \$776M+ to End WWE Ties After 50+ Years", <https://bleacherreport.com/articles/10118781-vince-mcmahon-sells-final-tko-shares-for-776m-to-end-wwe-ties-after-50-years#:~:text=WWE%20co-founder%20Vince%20McMahon%20is%20ending%20his%20association,of%20Friday%20for%20more%20than%20%24776%20million%20total> (last visited Oct. 21, 2024).

conduct that occurred in the 1970s through early 1990s, during which time Mr. McMahon was a citizen of Maryland and Connecticut and engaged in conduct in those states which forms the basis of this complaint.

235. Defendant LINDA MCMAHON, a Connecticut citizen, is the wife of Defendant VINCENT K. MCMAHON and co-founder of WWE where she worked as the President and later CEO from 1980 to 2009. Linda McMahon was also a resident of Maryland during part of the time period described herein. She was sometimes referred to as the “co-chief executive.”⁹³

236. Defendant WORLD WRESTLING ENTERTAINMENT, LLC (“WWE”) is a Delaware limited liability company that operates as a division of Defendant TKO Group Holdings, Inc. (“TKO”), a Delaware corporation. WWE’s corporate headquarters is located at 707 Washington Blvd., Stamford, CT 06901.

237. On its website, WWE states:

WWE® is an integrated media organization and the recognized global leader in sports entertainment. The company consists of a portfolio of businesses that create and deliver original content 52 weeks a year to a global audience. WWE is committed to family-friendly entertainment on its television programming, premium live events, digital media, and publishing platforms.⁹⁴

238. On September 12, 2023, a transaction completed between Endeavor Group Holdings and World Wrestling Entertainment, Inc., resulted in a merger between the WWE and Ultimate Fighting Championship (“UFC”) promotions and the formation of their new parent company, TKO.

⁹³ *The Atlantic*, “Linda McMahon and the Difference Between Wrestling and Politics”, <https://www.theatlantic.com/entertainment/archive/2010/10/linda-mcmahon-and-the-difference-between-wrestling-and-politics/65339/> (last visited Oct. 21, 2024).

⁹⁴ See *WWE*, “Who We Are – Company Overview”, <https://corporate.wwe.com/about/who-we-are> (last visited Oct. 21, 2024).

239. Defendant TKO GROUP HOLDINGS, INC. is a Delaware corporation that was formed for the purpose of facilitating the business combination of the UFC and WWE businesses. Its corporate office is located at 200 Fifth Ave, 7th Floor, New York, NY 10010.

240. Defendant TKO was formed on March 29, 2023, to be the parent company of the WWE when the merger of the UFC was completed.

241. TKO self identifies as:

TKO Group Holdings, Inc. (NYSE: TKO) is a premium sports and entertainment company that comprises UFC, the world's premier mixed martial arts organization, and WWE, an integrated media organization and the recognized global leader in sports entertainment. . . . TKO is majority owned by Endeavor Group Holdings, Inc. (NYSE: EDR), a global sports and entertainment company.⁹⁵

V. Jurisdiction and Venue

242. This Court has jurisdiction, pursuant to Md. Code, Courts & Judicial Proceedings §§ 1-501, 4-401, and 4-402(a), because the amount in controversy is in excess of thirty thousand dollars (\$30,000). There is personal jurisdiction over Defendants, pursuant to Courts & Judicial Proceedings § 6-103, because at all relevant times Defendants regularly transacted business in Maryland, contracted to provide services in Maryland, and caused tortious injury in Maryland.

243. Venue is proper in this Court under Md. Code, Courts & Judicial Proceedings § 6-201, as no single venue is applicable to all Defendants, but all may be sued in a county in which any one of them could be sued, or in the county where the cause of action arose. A substantial part of the events giving rise to Plaintiffs' claims occurred in Baltimore County.

244. During the relevant time period, WWE shows were routinely held in Maryland, which was one of the company's key locations from the earliest days of the McMahons' ownership

⁹⁵ See *TKO*, "About TKO", <https://tkogrp.com/about/> (last visited Oct. 21, 2024).

of the WWE, and each Plaintiff was sexually abused in Maryland.

245. WWE routinely held shows in Baltimore, Maryland and Landover, Maryland during the relevant time period of this Complaint.

246. Maryland has a substantial interest in resolving the issues of child sexual abuse that occurred within its borders regardless of the citizenry or residence of the abused child or the alleged abusers.

VI. Causes of Action

FIRST CAUSE OF ACTION – NEGLIGENCE AGAINST ALL DEFENDANTS

247. Plaintiffs incorporate and set forth all allegations above as if fully set forth herein.

248. Vince and Linda McMahon were the co-founders of modern professional wrestling and professional wrestling promotion: the WWE.

249. Together Vince McMahon, as the iron fist, and Linda McMahon, as his velvet glove, took over the wrestling promotion industry and dominated through consolidation and letting the fans in on the unspoken truth of professional wrestling—it was all scripted.

250. WWE and TKO are the same entity and/or a successor entity to WWF that existed at the time that the Plaintiffs were injured.

251. As successor entities, WWE and TKO acquired any and all assets and liabilities for the entity, WWF, and therefore, are liable for the conduct of the principals, agents, and employees that occurred in the course and scope of their employment and/or in furtherance of the WWF business and brand.

252. The McMahons' rise to the top in this industry involved a tremendous amount of control and sharp elbows. The McMahons controlled and knew everything within WWE, including the fact that executives, Patterson and Garvin, and the prominent public-facing ring announcer,

Phillips, were engaging in rampant sexual misconduct.

253. When the Ring Boy Scandal came to public light in the 1990s, WWE and the McMahons knew that they had to take action to stop damage to their enterprise and protect their interests at all costs, so they tried to deny their knowledge and underplay the allegations.

254. Instead of taking action to protect Plaintiffs, as required by the general duty of all adults, Vince and Linda McMahon failed to act even though they knew or should have known of the risk of sexual harassment and abuse that existed by their decision to employ Phillips, Patterson, and Garvin who had known sexual proclivities for underaged boys.

255. WWE and the McMahons actively created an environment that allowed Phillips and others to bring minors into the WWE—including to work as part of the ring crew—where there was a high risk and probability that they would be sexually harassed and abused.

256. The McMahons allowed Phillips to use the WWE and its assets to entice young boys to company events for Defendants' benefit in growing their audience and prominence in the world of wrestling entertainment, and they failed to take action to prevent injury to the Ring Boys or report it on suspicion of injury.

257. Plaintiffs met Phillips when they were minors under the age of 18.

258. When a minor is employed, the employer has a duty to provide a reasonably safe place to work and to warn of dangers.

259. Adults who work in that environment have a duty to know and be aware of the safety of the environment and to warn the children and their parents of safety risks.

260. WWE and the McMahons had a general duty to exercise reasonable care to avoid foreseeable injury to others, including the Ring Boys.

261. WWE and the McMahons had a duty to report any unsafe conditions and not to

exploit the Ring Boys for their own personal gain.

262. WWE and the McMahons had a duty to take affirmative action for the aid or protection of business invitees who are in danger on the business' premises because the WWE and the McMahons had knowledge of the danger posed by Phillips.

263. WWE and the McMahons breached their duties by allowing Phillips, as their employee or agent, to utilize the WWE to facilitate and further his penchant for sexual abuse of underaged boys.

264. The WWE and the McMahons exercised control over Phillips, Patterson, and Garvin as employees and agents of the WWE.

265. The WWE and the McMahons exercised control over the show venues and the ability of Phillips to bring underaged boys in and out of the venue for the purpose of assisting with the ring setup, along with the ability to prohibit Phillips from: using a private room before, during, and at shows; accessing free tickets; seating the Ring Boys ringside; allowing Phillips to introduce the Ring Boys to wrestlers at shows; and allowing Phillips to transport, recruit, feed, pay, employ, and provide lodging to underaged boys before and after shows.

266. Instead of exercising their control and authority over Phillips as an employee and an agent of WWE, to prohibit him from having inappropriate contact with minors and/or prohibiting him from using the WWE to traffic and sexually harass and abuse the Ring Boys, the McMahons allowed Phillips to utilize the WWE with impunity to satisfy his sexual desires.

267. The WWE and the McMahons knew that Phillips, Garvin, and Patterson employed underaged boys for the purpose of setting up and taking down the wrestling rings in various venues and states.

268. The WWE and the McMahons, either directly or indirectly, were providing Phillips

with the funds and tickets necessary to provide payment, room and board, tickets, and transportation to and from the wrestling events, and other monetary benefit to the Ring Boys as a method of compensation for the work they performed at WWE events setting up and taking down the rings.

269. The Ring Boys received some direct financial remuneration for their work for the WWE, but much of their payment was in the form of room and board, food, transportation, and free access to professional wrestling shows where they had opportunities to assist WWE employees and meet the wrestlers.

270. The WWE and the McMahons allowed WWE employees, including executives, particularly Phillips, Patterson, and Garvin, to find, recruit, transport, and hire the Ring Boys for WWE events.

271. Throughout the employment of Phillips, Patterson, and Garvin by the WWE and the McMahons, numerous allegations were made and commonly known within WWE that Phillips, Patterson, and/or Garvin individually and/or jointly engaged in behavior that would lead a reasonable person, employer, and contractor to believe or further inquire into the nature of the relationship between Phillips, Patterson, and Garvin and the Ring Boys, particularly Phillips's "peculiar and unnatural interest" in young boys. Mr. McMahon has never denied admitting his awareness of Phillips's interest, despite countless instances over the last four decades where, if it were untrue, he would have stridently denied it.

272. Vince and Linda McMahon, individually and in their capacity as the principals and managers of the WWE, knew or should have known that Phillips had engaged in sexual abuse of young boys under the age of 18, including Plaintiffs, who could not legally consent to engage in sexual behavior.

273. Vince and Linda McMahon, individually and in their capacity as the principals and managers of the WWE, knew or should have known that Phillips transported underaged boys, including Plaintiffs, across state lines for the purposes of engaging in business for and on behalf of the WWE.

274. Vince and Linda McMahon, individually and in their capacity as the principals and managers of the WWE knew or should have known that sexual harassment and abuse was a systemic problem within WWE, including allegedly involving WWE executives and Vince McMahon himself.

275. The WWF and its successor companies (the WWE and TKO) and the McMahons had duties to protect the Plaintiffs and other Ring Boys from sexual harassment and abuse by Phillips and others.

276. Ensuring the safety of children is a duty and obligation shared by all citizens and organizations, including but not limited to reporting suspected child abuse.

277. The WWF and its successor companies (the WWE and TKO) and the McMahons had a duty to provide the Ring Boys with a safe place to work, free of sexual harassment and abuse from WWE employees.

278. It was foreseeable to the WWF and its successor companies (the WWE and TKO) and to the McMahons that Phillips and other individuals within the WWF enterprise would sexually assault, molest, and/or abuse Plaintiffs and other Ring Boys; yet, Defendants failed to take the action reasonably necessary to warn or protect Plaintiffs and other Ring Boys from harm.

279. Instead of exercising their control and authority over Phillips, Patterson, and Garvin as employees and as agents of the WWF, to prohibit them from having inappropriate contact with minors and/or prohibiting them from using the WWF business enterprise to harass,

abuse, and traffic Plaintiffs and other Ring Boys, the WWE and its successor companies (the WWE and TKO) and the McMahons allowed Phillips, Patterson, and Garvin to utilize their positions within the WWE with impunity to satisfy their sexual desires, particularly Phillips's "peculiar and unnatural interest" in young boys.

280. As a result of Defendants' failures/breaches to comply with their duties to protect minor children and provide a safe workplace, Plaintiffs sustained actual and psychological injuries as a result of their sexual harassment and abuse by WWE employees, particularly Phillips.

281. Plaintiffs each sustained actual physical and mental injuries, lost wages, and benefits of employment, and suffered mental and emotional distress.

282. As a direct and proximate result of the conduct of Defendants WWE and its successor companies the WWE and TKO, Plaintiffs have lost wages and benefits, sustained damage to their reputations and careers, and suffered mental and emotional distress.

283. Plaintiffs have been injured in an amount in excess of \$30,000 and are entitled to judgment against all Defendants for their illegal and wrongful conduct.

**SECOND CAUSE OF ACTION – NEGLIGENT HIRING, TRAINING, AND
RETENTION**

AGAINST ALL DEFENDANTS

284. Plaintiffs incorporate and set forth all allegations above as if fully set forth herein.

285. The WWE and the McMahons employed Phillips, Patterson, and Garvin for decades.

286. Phillips, Patterson, and Garvin used their jobs with the WWE to sexually harass and abuse innocent persons, including Ring Boys, which caused injuries to Plaintiffs and other Ring Boys.

287. Defendants have a duty to hire staff at all levels to ensure that such management

and staff does not create a risk of harm to the public, particularly minors.

288. Defendants have a duty not to employ any person who they know or reasonably should know poses an unreasonable risk to other persons, particularly minors, who would foreseeably come into contact with that person because of the person's employment.

289. Defendants hired, supervised, and retained Phillips despite Defendants' actual or constructive knowledge that Phillips was sexually harassing and abusing Plaintiffs and other Ring Boys.

290. For example, WWE and the McMahons knew that Phillips had a "peculiar and unnatural interest and attachment to children," they saw him going around with kids, and both decided that it was wrong. They temporarily fired Phillips for such conduct in 1988, but then re-hired him merely six weeks later with the caveat that he "steer clear of underaged boys, stop hanging around kids, and stop chasing after kids." Phillips did not stop.

291. In 1992, WWE and the McMahons temporarily fired Patterson when certain details of the Ring Boy Scandal became public, but he quickly returned.

292. Defendants hired, supervised, and retained Phillips, Patterson, and Garvin despite Defendants' actual or constructive knowledge that the WWE had a culture of systemic sexual harassment and abuse that was fostered by Phillips, Patterson, Garvin, Vince McMahon, and others.

293. It was reasonably foreseeable that Phillips, Patterson, and Garvin would injure Plaintiffs and other Ring Boys through sexual harassment and abuse.

294. Defendants failed to take any reasonable and appropriate action to protect Plaintiffs from harm by Phillips. Defendants breached their duties to protect minors like Plaintiffs and other Ring Boys, other WWE employees or agents, and third parties from sexually harassing and/or

abusive conduct.

295. Defendants failed to make a reasonable inquiry into the conduct of Phillips, Patterson, and Garvin to ascertain their fitness—particularly with respect to their interactions with underaged boys—before hiring, supervising, and retaining them.

296. Defendants could not rely on Phillips, Patterson, and Garvin to perform their employment duties without engaging in sexually harassing and abusive conduct.

297. Instead of exercising their control and authority over Phillips, Patterson, and Garvin as employees and as agents of the WWE, to prohibit them from having inappropriate contact with minors and/or prohibiting them from using the WWE business enterprise to harass, abuse, and traffic Plaintiffs and other Ring Boys, the WWF and its successor companies (the WWE and TKO) and the McMahons allowed Phillips, Patterson, and Garvin to utilize their positions within the WWE with impunity to satisfy their sexual desires, particularly Phillips’s “peculiar and unnatural interest” in young boys.

298. Defendants acted negligently by hiring, supervising, and retaining Phillips, who proximately caused Plaintiffs’ injuries.

299. The Plaintiffs have each sustained actual physical and mental injuries, lost wages, and benefits of employment, and suffered mental and emotional distress.

300. Plaintiffs have been injured in an amount in excess of \$30,000 and are entitled to judgment against all Defendants for their illegal and wrongful conduct.

WHEREFORE, Plaintiffs demand judgment in their favor and against the Defendants in an amount in excess of \$30,000.00 to be proven at trial for damages resulting from their conduct that led to the Plaintiffs and other Ring Boys being sexually harassed and abused by the employees and actual or apparent agents of Defendants. Plaintiffs further demand the right to a jury trial on

these issues and for an award of their attorneys' fees and costs in the prosecution of this matter and any and all other relief that the Court deems just and equitable.

Dated: October 23, 2024

/s/ William H. Murphy, Jr.

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